

# Exhibit 11

REPORTER'S RECORD  
VOLUME 2 OF 9 VOLUME  
TRIAL COURT CAUSE NO. D-1-GN-18-001835

NEIL HESLIN AND SCARLETT ) IN THE DISTRICT COURT  
LEWIS, )  
 )  
Plaintiffs )  
 )  
VS. ) TRAVIS COUNTY, TEXAS  
 )  
ALEX E. JONES AND FREE )  
SPEECH SYSTEMS, LLC, )  
 )  
Defendants ) 261ST JUDICIAL DISTRICT

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TRIAL ON THE MERITS  
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On the 27th day of July, 2022, the  
following proceedings came on to be heard in the  
above-entitled and numbered cause before the Honorable  
Maya Guerra Gamble, Judge presiding, held in Austin,  
Travis County, Texas;  
Proceedings reported by machine shorthand.

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I N D E X  
VOLUME 2  
TRIAL ON THE MERITS  
JULY 27, 2022

PLAINTIFF'S WITNESSES

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1 WEDNESDAY, JULY 27, 2022 - MORNING PROCEEDINGS

2 *(The following proceedings were held in open*  
3 *court in the presence of the jury)*

4 THE COURT: All right. You may be seated.  
5 Thank you.

6 Miss Karpova, you're still under oath.  
7 We're just going to pick up right where we left off  
8 yesterday. All right?

9 THE WITNESS: Yes, ma'am.

10 THE COURT: Same instructions as before.

11 THE WITNESS: Thank you.

12 THE COURT: And whenever you're ready.

13 MR. BANKSTON: Thank you, Your Honor.

14 DARIA KARPOVA,

15 Having been duly sworn, testified as follows:

16 DIRECT EXAMINATION

17 BY MR. BANKSTON:

18 Q. Miss Karpova, before we get started I have  
19 the exhibits up here from yesterday, and I'm going to  
20 put Exhibit 31 back in front of you. This is the list  
21 of all the videos.

22 Do you remember that?

23 A. Yes, yes.

24 Q. Okay. All right, Miss Karpova, I kind of  
25 want to recap where we're at. So, I want to remind the

1 jury, yesterday we talked about some videos, we started  
2 talking about them; right?

3 A. Yes.

4 Q. Okay. And you remember the first one of  
5 those was on the day of Sandy Hook. You remember that?

6 A. Yes.

7 Q. And that video on December 14th, 2012, was  
8 called "Connecticut School Massacre Looks Like False  
9 Flag, Says Witnesses." Correct?

10 A. Correct.

11 Q. We also looked at a video that was done five  
12 days after Sandy Hook, on December 17th, 2012. Do you  
13 remember that?

14 A. Yes.

15 Q. And that video was called "Creepy Illuminati  
16 Message in Batman Movie Hints At Sandy Hook School;" is  
17 that right?

18 A. Correct.

19 Q. Then we also looked at another video that  
20 was just a couple of days later, seven days after the  
21 shooting, and that one was entitled "Sandy Hook Second  
22 Shooter Coverup." Right?

23 A. Yes, sir.

24 Q. And then we talked about another video that  
25 was two days after that, on December 21st, 2012, and

1 that was entitled "Lower Part of Gotham Renamed 'Sandy  
2 Hook' in Dark Knight Film"?

3 A. Yes, correct.

4 Q. Okay. And then we talked about how, on  
5 January 10th, as we turn the new year, there was a video  
6 entitled, "Professor Claims Sandy Hook Massacre MSM  
7 Misinformation."

8 A. Correct.

9 Q. Okay. And then we talked about how, on  
10 January 15th, 2013, five days later, InfoWars published  
11 a video titled "Sandy Hook AR-15 Hoax? Still No School  
12 Surveillance Footage;" correct?

13 A. Yes.

14 Q. And then we talked about a video a couple of  
15 weeks later, on January 27th, 2013, and that one was  
16 entitled "Why People Think Sandy Hook is a Hoax."

17 A. Yes.

18 Q. Okay. And then at the end of the day we  
19 talked about an email with one of the parents. Do you  
20 remember that?

21 A. Yes.

22 Q. It was an email in which one of the parents  
23 was asking InfoWars to please knock it off with the  
24 crisis actor and false flag terror stuff on the  
25 coverage. Do you remember that?



1 A. I remember it was sent to the writers, yes.

2 Q. Okay. And, in fact, it was replied to,  
3 wasn't it?

4 A. Yes.

5 Q. And then what the reply was was that  
6 InfoWars had an editor claiming they were actively  
7 distancing themselves from the actors thing?

8 A. Well, the point on that, I think Paul Joseph  
9 Watson, I'm not sure if he was speaking exactly for Alex  
10 Jones himself, he might have just been speaking for  
11 himself and other employees at InfoWars. But as to Alex  
12 Jones, I'm not sure if he was speaking for him.

13 Q. Well, and that would make sense, wouldn't  
14 it, because you also testified yesterday that InfoWars  
15 did not distance itself from the actors thing; correct?

16 A. Alex Jones did mention he continued to  
17 wonder and search for the truth in the incident, yes.

18 Q. Okay. Now, let's pick back up, and we had  
19 just gotten to basically a month after the shooting, we  
20 had seen all these videos about false flags. And then,  
21 in March 2013, you understand that InfoWars published a  
22 broadcast that day, didn't it?

23 A. You're referring to one of the videos?

24 Q. On March 27th, 2013.

25 A. Yes.

1 Q. What is the title of that video?

2 A. "Dr. Steve Pieczenik: Sandy Hook Was a  
3 Total False Flag."

4 Q. Okay. So, "Dr. Steve Pieczenik: Sandy Hook  
5 Was a Total False Flag."

6 If I'm correct, Dr. Steve Pieczenik is  
7 somebody that has told Alex that he used to be in the  
8 CIA.

9 A. I'm not -- I don't have the details of his  
10 bio, but he has a pretty extensive bio that has to do  
11 with psychological operations, working for the  
12 government, being involved in overthrowing governments,  
13 things like that.

14 Q. Does he have those credentials or did he  
15 just tell InfoWars he has those credentials?

16 A. He's reported to have those credentials,  
17 that's what he claims in his bio.

18 Q. Reported by Mr. *PEACH*-nick, right? Or  
19 Pe-*CHEN*-ik?

20 A. Pe-*CHEN*-ik, yes.

21 Q. And that episode, when that episode is  
22 talking about false flags in that instance, you're  
23 talking about crisis actors; right?

24 A. Specifically crisis actors, I can't remember  
25 if that specifically was mentioned in there.

1 I just want to be very accurate.

2 Q. Sure.

3 Okay. Well, let's talk four days later.

4 Can you flip the page for me?

5 A. Yes.

6 Q. What's the next video called on April 1st,  
7 2013?

8 A. "Crisis Actors Used At Sandy Hook, Special  
9 Report."

10 Q. Okay. So, there we have April 1st, 2013,  
11 InfoWars is publishing a video called "Crisis Actors  
12 Used At Sandy Hook, Special Report." Correct?

13 A. Yes.

14 Q. Okay. On April 9, 2013, InfoWars published  
15 a video about Sandy Hook; correct?

16 A. Yes.

17 Q. And that video was called "Obama Gun Grab  
18 Psyop." Correct?

19 A. Correct.

20 Q. And would you agree with me that "PSYOP"  
21 means "psychological operation"?

22 A. Yes.

23 Q. So, we've seen now a list of videos from  
24 2013 talking about things like false flag, crisis  
25 actors, hoax. Do you agree with that?

1 A. Yes.

2 Q. Okay. So, if somebody was to say in this  
3 courtroom that Mr. Jones in 2013 was not saying this was  
4 fake, was not saying it was a hoax, was not saying that  
5 there were crisis actors pretending to be these victims,  
6 that would not be true, is it.

7 A. I think it -- it would be true because,  
8 again, Alex Jones was still researching things, and with  
9 the contradictions in the media that was thrown in that  
10 time, in the mainstream media, he thought it was his  
11 duty to investigate, especially when it involves  
12 something as tragic as the deaths of children that  
13 shouldn't be used in, say, a government operation.

14 Q. Can you look at the title of that April 1st  
15 video for me. Do you see it on the page?

16 A. Yes.

17 Q. Okay. The title of that video is not there  
18 are contradictions that raise questions about what  
19 happened at Sandy Hook. The title of that video, if I'm  
20 right, is "Crisis Actors Used At Sandy Hook." Is that  
21 right?

22 A. Correct.

23 Q. Okay.

24 A. But oftentimes titles just are meant to grab  
25 audiences' attention, and then later in the video they

1 get into details.

2 Just like all of the mainstream media  
3 does, flip on any newspaper right now, website, it's  
4 going to be full of clickbait articles. And I'm not  
5 even saying that this is clickbait, but I'm saying it's  
6 meant to grab a person's attention so they can take a  
7 look at the video and see the details.

8 Q. Sure does grab attention, right, that there  
9 are crisis actors used at Sandy Hook. That's pretty  
10 shocking.

11 A. That would be pretty shocking, yes.

12 Q. Sure would.

13 You'll agree with me that it was known  
14 that the official reports of Sandy Hook that were  
15 released by the Connecticut State Attorney's Office,  
16 those were available to InfoWars, and InfoWars knew they  
17 were available on -- by December of 2013.

18 A. I don't believe that's true.

19 Q. Okay. Miss Karpova, I am going to approach  
20 you now and show you the company's March -- I mean,  
21 excuse me, the company's May 20th, 2019, Request For  
22 Admissions. We're going to look at those together,  
23 okay?

24 A. Yes.

25 Q. We're going to read this together, okay?

1 Can you see 245 here?

2 A. Yes.

3 Q. Okay. I'm going to read it for you:

4 "The report of the state's attorney for  
5 the Judicial District of Danbury on the shootings at  
6 Sandy Hook Elementary School at 36 Yogananda Street,  
7 Newtown, Connecticut, on December 13th, 2012, was  
8 released to the public on November 25th, 2013."

9 Can you read what the company's answer to  
10 that was?

11 A. "Admit."

12 Q. Then on 246 it states, "This report and the  
13 appendix to the report can be accessed and downloaded  
14 from the following website," and then you see a website  
15 here.

16 A. Yes.

17 Q. Then what is the company's answer?

18 A. "Admit."

19 Q. And then the company was asked, "You were  
20 aware that this report was publically available on or  
21 about December 1st, 2013."

22 What is the company's answer?

23 A. "Admit."

24 Q. Thank you, Miss Karpova.

25 THE COURT: I think it's important to make

1 a little instruction for the jury at this time.

2 So, those questions and answers are part  
3 of the process that leads up to trial. And similar to  
4 how Miss Karpova is under oath today as she gives her  
5 answers, when the representative for the company  
6 answered those questions in writing, it was a sworn  
7 answer.

8 BY MR. BANKSTON:

9 Q. And speaking of that process that happened  
10 pre-trial to answer these questions, that's something  
11 that you were involved with in the company, helping to  
12 answer these things and provide testimony?

13 A. Yes.

14 Q. In fact, not only was the company aware of  
15 the report, but it had the report. You agree with that?

16 A. Must have had the report, yes.

17 Q. Okay.

18 A. It must have questioned the report, which is  
19 why Alex continued to dig into the story.

20 Q. Right.

21 So, people at InfoWars, editors at  
22 InfoWars, had access to all of the material that was in  
23 the state's attorney's report. You agree with that?

24 A. Evidently so, yes.

25 Q. Okay. Now, I want to talk to you a little

1 bit about Wolfgang Halbig. You know who he is; right?

2 A. Yes.

3 Q. In fact, you personally, Daria Karpova,  
4 you're someone who has an understanding of  
5 Mr. Halbig's -- what he calls his questions about Sandy  
6 Hook. You understand?

7 A. I do have a general understanding that this  
8 person, who had the credentials to question this event,  
9 did have several questions on the list that were not  
10 answered.

11 Q. Okay.

12 A. That was my understanding.

13 Q. What I'm specifically asking you is not just  
14 you had an understanding that he had questions, you have  
15 an understanding of those questions.

16 A. I can't recall the specific questions right  
17 now.

18 Q. Sure. But if I bring any of these questions  
19 to you, you have a knowledge base and an understanding  
20 that you can talk about those questions, can't you.

21 A. I'm not sure what you mean by that.

22 Q. I'm saying you, through your personal  
23 knowledge you've gained, if I were to ask you about any  
24 of Wolfgang Halbig's 16 questions, you have done the  
25 research that would allow you to answer and tell us



1 about those questions?

2 MR. REYNAL: Your Honor, I object. It  
3 calls for hearsay as to, you know, so you understand his  
4 questions and you've done the research and then you're  
5 going to tell me about the research that you've done?

6 THE COURT: Overruled.

7 BY MR. BANKSTON:

8 Q. Do you have an understanding, Miss Karpova?

9 A. Well, I -- my job is comprised of doing a  
10 lot of things, and since Sandy Hook was not the focus of  
11 our broadcasts at all, I have a lot of duties to take  
12 care of and research, so I didn't really spend much time  
13 into digging in depth of these specific questions.  
14 Because that wasn't -- that wasn't my priority as the  
15 producer, having to take care of a lot of things. And  
16 it's a live broadcast, so there are a lot of things to  
17 take care of before and after the show.

18 Q. You remember giving a deposition with me,  
19 right?

20 A. Yes.

21 Q. On December 3rd, 2021?

22 A. Yes, sir.

23 Q. You were under oath?

24 A. Yes.

25 Q. Do you remember telling me in that

1 deposition when I asked you, do you have an  
2 understanding of Mr. Wolfgang Halbig's 16 questions  
3 about Sandy Hook and you telling me yes?

4 A. Again, that's just very vague questions. I  
5 generally have an understanding. But exactly what you  
6 mean by that, I'm not even sure right now what you mean  
7 by that.

8 Q. Well, let's find out, okay, let's go to the  
9 next video that I want to talk to you about, which is  
10 March 14th, 2014. Do you see that?

11 A. Yes, I do.

12 Q. That video is entitled "Sandy Hook, False  
13 Narratives vs. The Reality"?

14 A. Yes, sir.

15 Q. Okay. I'm going to want to show you a clip  
16 from that video so we can talk about it. Okay?

17 A. Yes.

18 MR. BANKSTON: At this time can we play  
19 8A.

20 *(Video played off the record.)*

21 BY MR. BANKSTON:

22 Q. You heard Mr. Jones in that video refer to  
23 Mr. Halbig as a top consultant; correct?

24 A. Yes. That's what Halbig claimed to be.

25 Q. That's what he claimed to be; right?

1           A.     Yes.

2                     We didn't have any reason to doubt it at  
3     that time.

4           Q.     Really.  So, would you agree with me that  
5     people were explicitly warning the company that Wolfgang  
6     Halbig's credentials were not real?

7           A.     Again, there are so many emails that we get  
8     it's impossible to go through every email, and if it  
9     went to writers, or I can't remember exactly who it went  
10    to, but if it didn't get to Alex or even if he was  
11    warned, I'm just, you know, I can't speak for Alex.

12                    But again, a lot of people were  
13    questioning, not just Wolfgang Halbig, and Alex felt it  
14    was his duty to address the concerns of the people who  
15    were callers calling into the show.  Again, it didn't  
16    even happen that often.

17           Q.     Okay.  But what I want to make sure you  
18    don't dispute with me is that people definitely were  
19    warning the company in explicit terms that Wolfgang  
20    Halbig's credentials were fake.  Would you agree with  
21    that?

22           A.     Would you tell me exactly what you're  
23    referring to?

24           Q.     I'm just asking if you agree with it.

25           A.     I can't remember right now.

1 Q. Okay. Thank you.

2 The truth is, though, it doesn't matter  
3 whether people were warning you at InfoWars, because,  
4 according to you, as an InfoWars producer, you do not  
5 believe you're responsible for verifying all the claims  
6 of your guests. That's true?

7 A. It just would not be possible to verify  
8 everything. We have guests. It's a talk radio show.

9 Q. I understand.

10 A. It would be impossible. It's an  
11 opinion-driven talk show, political and social  
12 commentary.

13 Q. So, before Wolfgang Halbig comes on the show  
14 your testimony is it is impossible to check or verify  
15 his credentials.

16 A. I wasn't the producer at that time, and I'm  
17 sure the producer at that time did the best they could  
18 to verify his credentials, and to him it might have  
19 checked out. I'm just -- that's the standard practice,  
20 we do a basic look into the guest and if they seem okay,  
21 if they've been on other shows, then we, you know, we  
22 give them platform and let the audience decide if they  
23 should listen to them, believe them or turn them off.

24 Q. Okay. But, what I really want to get to,  
25 Miss Karpova, is you believe, as an InfoWars producer,

1 it is not your responsibility to verify your guest's  
2 claims; correct?

3 A. I would say it's in part my responsibility.

4 Q. Okay. Do you remember --

5 A. And I do that as in my job to the best of my  
6 ability. Sorry.

7 Q. That's okay. I'll give you some time.

8 Do you remember giving this deposition in  
9 December 3rd, 2021?

10 A. Yes.

11 Q. Okay. And you were under oath at that time.

12 A. Yes.

13 Q. Okay. Do you remember in that deposition  
14 when I asked you if you think Wolfgang Halbig's  
15 credentials are true or reliable that you told me that,  
16 I'm not responsible for making sure the claims of our  
17 guests are all accurate. Do you remember telling me  
18 that?

19 A. Yes. And that comports to what I'm saying  
20 right now.

21 Q. That -- it's not your responsibility to  
22 verify any of this. That's what you're telling me.

23 A. To the best of my ability.

24 Q. Well, I mean what I'm saying to you, it was  
25 your testimony under oath last year.

1 A. Yes, that's what I was referring to.

2 Q. That you had no responsibility.

3 A. Well, I don't think I said no  
4 responsibility.

5 And I'm sorry to be interrupting you.

6 THE COURT: Right. Only one person can  
7 speak at a time.

8 THE WITNESS: Again, my truthful answer is  
9 that I do -- it's my responsibility to do my best to  
10 research the guest and their claims. And I've done that  
11 before and I think you actually have an email that I  
12 authored referring to a guest that I didn't think was  
13 credible at the time, another guest. So, I do -- I do  
14 do that on a regular basis, and that's what I was  
15 referring to.

16 It is my responsibility to the best of my  
17 ability, but beyond that it isn't. I'm not the arbitor  
18 of ultimate truth of the claims.

19 BY MR. BANKSTON:

20 Q. I hear you.

21 I would like to show you that question and  
22 answer from your deposition, which is different from  
23 this.

24 Are you able to see that? Is this close  
25 enough for you?

1           A.     Yes.

2           Q.     Okay. I'm going to read the question and I  
3 would like you to read the answer, okay?

4                     And I said, "I'm sure Wolfgang Halbig has  
5 said a lot of things about his credentials. Do you  
6 think they're all true? Do you think Wolfgang Halbig is  
7 a reliable source about his own credentials?"

8                     What was your answer?

9           A.     "I'm not responsible for making sure that  
10 the claims of our guests are all accurate."

11          Q.     Thank you, ma'am.

12                     THE COURT: I'm going to interrupt one  
13 more time, just to give the jury another instruction  
14 about depositions, which is what was just read from in  
15 case you aren't familiar with them.

16                     A deposition is a procedure conducted out  
17 of court in which a witness testifies under oath  
18 answering questions asked by one or more attorneys.  
19 Later in this trial you may hear longer excerpts from  
20 depositions, but I wanted you to understand that it is a  
21 procedure conducted out of court but with the same oath  
22 as in court, so those answers are also under oath.

23                     And I'll tell you more about depositions  
24 when we hear a longer one later.

25                     MR. BANKSTON: Thank you, Your Honor.

1 BY MR. BANKSTON:

2 Q. Let's go to the next video that I want to  
3 talk to you about.

4 Do you have the list of videos in front of  
5 you?

6 A. I do.

7 Q. On May 9th, 2014. Do you see that?

8 A. Yes.

9 Q. Okay. That was an episode called "Revealed:  
10 Sandy Hook Truth Exposed."

11 A. Yes.

12 Q. And InfoWars wants its viewers to have faith  
13 that they can get the truth from InfoWars; correct?

14 A. It's up to the -- we always rely -- we  
15 always -- we think our audience is smart and we rely on  
16 them to figure out for themselves what they think is  
17 true and what's not. But we present our opinion.

18 Q. Well, the truth, right? That's what you're  
19 telling your audience you give them is the truth?

20 A. Sure. Everybody has their own definition of  
21 truth.

22 Q. I don't think that's true, Miss Karpova.  
23 Isn't there a truth and anything that's not true, or  
24 people have other truths that compete with each other.  
25 How do you view that?



1           A.     Well, because a lot of things you said in  
2 opening statement weren't true.

3           Q.     Well, if they're not true, they weren't  
4 true, I'm sure somebody is gonna prove that.

5                     What I'm saying is that, we've watched on  
6 these videos and you've seen the tag line up on those  
7 videos where it says "InfoWars, the Front Line of Truth  
8 Journalism." That's true, isn't it?

9           A.     In a way that we believe what we're saying,  
10 absolutely. And we stand by that.

11           Q.     Okay. On May 13th, just a couple of days  
12 later, May 13, 2014, InfoWars aired an episode entitled  
13 "Sandy Hook Officials Caught in Coverup and Running  
14 Scared." Is that true?

15           A.     That's the title, yes.

16           Q.     And that meant that the town officials were  
17 hiding the truth; right?

18           A.     Again, I'm referring to my previous answer,  
19 that is a title that's meant to catch the audience and  
20 watch the video for more details.

21           Q.     Let's talk about another one of those  
22 titles. And that was on the same day. Do you see  
23 another video on May 13th, 2014?

24           A.     Yes.

25           Q.     And you'll see it's called "Bombshell:

1 Sandy Hook Massacre Was a DHS Illusion Says School  
2 Safety Expert."

3 A. Yes, sir.

4 Q. DHS stands for Department of Homeland  
5 Security?

6 A. Yes.

7 Q. Okay. I would like play you a clip from  
8 that video.

9 Let's go ahead and play 9A.

10 And this should be the clip from  
11 "Bombshell: Sandy Hook Massacre Was a DHS Illusion Says  
12 School Safety Expert."

13 *(Video played off the record.)*

14 During the video we saw some video footage  
15 of Wolfgang Halbig at a Newtown Board of Education  
16 meeting? You're familiar with that?

17 A. Yes, I saw that video.

18 Q. Okay. That video was taken by an InfoWars  
19 camera crew?

20 A. I'm not sure.

21 Q. Okay. Well, you understand Dan Bidondi went  
22 up there; right?

23 A. Yes, he did.

24 Q. Okay. That's an InfoWars reporter.

25 A. I think at some time he was reporting, he

1 took that responsibility onto himself.

2 Q. Really. So, I'll try to understand your  
3 testimony --

4 A. Just like all the reporters for InfoWars, as  
5 well.

6 Q. Okay. So, in other words, he's just -- just  
7 as any other reporter --

8 A. I'm just saying, there are other reporters  
9 or people that have proclaimed to be InfoWars reporters  
10 that Alex specifically didn't solicit that just go out  
11 there and do their own investigative research as people,  
12 things on the street, yes.

13 Q. That's not what happened with Dan Bidondi  
14 going to Newtown though; right? InfoWars sent Dan  
15 Bidondi to Newtown; correct?

16 A. I don't remember the specifics of him being  
17 sent.

18 Q. Let's start -- first of all, Dan Bidondi was  
19 a hired employee of InfoWars; right?

20 A. Again, I would have to talk to the H.R.  
21 person. I'm not sure his status as to employee or  
22 contractor, just --

23 Q. Let's maybe put it this way, this may  
24 shorten it up. You might not be the best person to talk  
25 about Dan Bidondi's employment status; correct?

1 A. Correct.

2 Q. Okay. We'll deal with that with some  
3 others.

4 On May 14th, 2014, there was another  
5 video; correct?

6 A. Yes.

7 Q. And that one was called "Sandy Hook Red  
8 Flags Ignored By Newtown School Board." Correct?

9 A. Yes.

10 Q. Okay. And that was another report about the  
11 meeting that Mr. Halbig was at.

12 A. I believe so.

13 Q. Okay. I want to show you an email from that  
14 day.

15 *(Discussion between counsel off the record.)*

16 MR. REYNAL: No objection.

17 THE COURT: All right.

18 MR. BANKSTON: Your Honor, at this time we  
19 would move to admit Plaintiffs' Exhibit 53.

20 THE COURT: 53 is admitted.

21 *(Plaintiff's Exhibit 53 admitted.)*

22 BY MR. BANKSTON:

23 Q. I'm going to hand you a copy of what's been  
24 marked Plaintiffs' Exhibit 53.

25 And again I do apologize to the jury, I

1 know on these emails this lettering is very small.

2 So, we're going to read this together.

3 Okay, Miss Karpova?

4 A. Yes.

5 Q. Okay. So, follow along with me here. And  
6 what we have is an email at the bottom and that is from  
7 Matt@InfoWars.com; correct?

8 A. Correct.

9 Q. And it is to LouieS@InfoWars.Com; correct?

10 A. Yes.

11 Q. Okay. Now, Louie is somebody who handles a  
12 lot of the website and social media stuff. You would  
13 agree with that?

14 A. Yes.

15 Q. Okay. So Matt, an InfoWars employee, writes  
16 to Louie and he says:

17 "Hello, Louie. Could you do me a favor?

18 Just got a phone call from my friend Johnny  
19 Walker. Some people are posting some bullshit  
20 about how he was involved in the Sandy Hook  
21 school shooting last year, including some  
22 personal stuff about John. They did the thing  
23 about a year ago. Apparently there are more  
24 than one Johnny Walker in the world. Last time  
25 it involved going through his Facebook page and

1 pointing out friends with Jewish names and  
2 things like that. John is a character, but was  
3 not even in the Sandy Hook time zone."

4 "If you see it, could you take care of it  
5 for him?

6 "Thanks, Matt W."

7 Did I read that correctly?

8 A. Yes.

9 Q. Okay. And then Louie says, "The site has  
10 been acting weird and not letting me search."

11 I think we can make a fair assumption he's  
12 talking about the InfoWars website at that point?

13 A. I believe so.

14 Q. Okay. And he says, "If he can give me an  
15 article or user name involved, let me know. Otherwise,  
16 I'll see it at I'll get on it," and then a little winky  
17 face smile.

18 Now, it's true that the InfoWars website  
19 has portions of it where viewers can participate in  
20 forums and post things on the website.

21 A. There are comments, which is a -- typical of  
22 video hosting site or article hosting site to where,  
23 underneath the article, users, the registered users, are  
24 able to post some comments.

25 Q. And what's being said here from Matt to

1 Louie, is Matt's telling Louie that one of his friends  
2 is getting caught up in this Sandy Hook hoax stuff by  
3 users of the website, and he would like Louie to delete  
4 that stuff, and Louie says he will do that if he finds  
5 it. That's correct?

6 A. Correct.

7 Q. Okay. I want to talk to you about an  
8 article. And that article was called, "FBI says nobody  
9 died at Sandy Hook." You know what I'm talking about,  
10 don't you?

11 A. Could you refresh my memory, please?

12 Q. Sure, I think we can do that. One thing  
13 that I think would be really easy to refresh your memory  
14 with is Plaintiffs' exhibit 39 that we looked at the  
15 other day. Yesterday.

16 Malisa, can you put 39 up on the screen  
17 for me? And Malisa, can you zoom in on the entry for  
18 number 14?

19 Okay. You saw we were looking at the  
20 analytics of the InfoWars website before; correct?

21 A. Yes.

22 Q. Okay. And here we have an entry for a  
23 landing page, a website for an article at InfoWars;  
24 correct?

25 A. Correct.

1 Q. Okay. And that article, it writes here,  
2 "FBI Says No One Killed At Sandy Hook." Right?

3 A. Correct.

4 Q. Okay. And the number of people who saw  
5 that, the page views on that page, 3,646,000 people,  
6 that's the number of clicks on that story?

7 A. Yes.

8 Q. Okay. I would like you, too, if I can put  
9 this in front of you, as we go down those lists on the  
10 list of 1 to 14, most of the things on the list of the  
11 top landing sites on InfoWars are things just like  
12 InfoWars.com/, or InfoWars.com/videos; right? That's  
13 another one. Or there's another one for the sections on  
14 the website, the various sections of the website.  
15 Right?

16 A. Yes.

17 Q. But we only see on this list, this one right  
18 here is a story, number 7; right?

19 A. Yes. Looks like a video maybe.

20 Q. Okay. And then if you look down you'll see  
21 there's another story listed, too; right? There's a  
22 couple of stories on there.

23 But you would agree with me that "FBI Says  
24 No One Killed Sandy Hook" is the third most viewed story  
25 on that list?



1           A.    I think it might be a video, but let's see.  
2    Again I'll take your word for it. I'm just, I'm not  
3    able to really quickly calculate the ratings right now.  
4    If there -- oh, yeah. Can you show -- can you point it  
5    out?

6           Q.    Well, here, let me try to go down it with  
7    you and we can see. All right?

8           A.    Yes.

9           Q.    All right. I might need my reading glasses  
10   for this one. It's very small print.

11                   Well, those are coming apart on me. We're  
12   going to do it this fancy way for a moment. Hello to  
13   you. This is horrible.

14                   All right. So, we have number 7; right?

15           A.    Yes.

16           Q.    You see number 7? And that says --

17           A.    Looks like a video to me.

18           Q.    Right. And it says, "Graphic, shocking,  
19   complete video shot from Virginia gunman's point of  
20   view." Right?

21           A.    Yes.

22           Q.    This isn't a story, right, that's not story?

23           A.    Correct.

24           Q.    The next story would be this one, right, 13.  
25   You agree with me?

1           A.     Again, I think it's a video. I know you're  
2     saying story, but I think it's a video.

3           Q.     Let's talk about it this way.

4           A.     I'm not sure. Yes.

5           Q.     Right, and because we're not sure, let's  
6     call it a landing page. This is a landing page, right,  
7     this was "Boston Bombing Culprits Found;" right?

8           A.     Yes.

9           Q.     And then this one is 14, "FBI Says No One  
10    Killed At Sandy Hook."

11          A.     Yes.

12          Q.     That's the third one on the list, right,  
13    third most popular of those landing pages or stories or  
14    videos.

15          A.     Oh, got you. Yes.

16                 MR. BANKSTON: Thank you, Miss Karpova.

17                 Your Honor, if you will give me just a  
18    second to go in here and replace my defective eyewear.

19                 THE COURT: Yes. I was going to say, I  
20    keep a pair up here for witnesses which we can share.  
21    But if you have more, that's great.

22                 MR. BANKSTON: I'm good.

23                 THE COURT: You would be amazed how many  
24    witnesses don't bring their reading glasses with them.

25                 MR. BANKSTON: Not a bad trick, I would

1     imagine.

2                   THE COURT: I never thought of that. I  
3     really just thought they forgot them because they didn't  
4     know they would be reading something.

5     BY MR. BANKSTON:

6                   Q. All right. I want to talk about the  
7     following day. Miss Karpova, we talked about this  
8     article, FBI, or video, I don't know how it was  
9     presented. But I want to talk about the following day,  
10    on September 25th, 2014. Do you see a video on that  
11    list?

12                  A. Yes.

13                  Q. Okay. And let me ask you this, do you see a  
14    video on September 24th, 2015?

15                  A. I do not.

16                  Q. So if there is a video entitled "FBI Says  
17    Nobody Killed At Sandy Hook," if that's a video and not  
18    an article, InfoWars never handed it over in this case.

19                  A. I guess they couldn't find it. It wasn't  
20    there.

21                  Q. Because --

22                  A. Because of the de-platforming.

23                  Q. Because there's a lot of videos that  
24    InfoWars might not be able to find anymore; right?

25                  A. Correct.

1 Q. So, if somebody was to say that those videos  
2 on that list were the total amount that InfoWars covered  
3 Sandy Hook, they can't say that, can they?

4 A. I don't know.

5 Q. Okay. I want to talk about that next day,  
6 September 25th, 2014. There was a video called "Sandy  
7 Hook Deaths Missing From FBI Report." Do you agree with  
8 that?

9 A. That's the title.

10 Q. Okay. I would like to show you a clip from  
11 that video.

12 *(Video played off the record.)*

13 Miss Karpova, did you hear Mr. Jones say  
14 in that episode or in that clip right there there are  
15 photos of kids who are still alive they said died?

16 A. Yes.

17 Q. That would be pretty shocking if it were  
18 true; right?

19 A. It would be pretty shocking if he looked at  
20 those photos and thought those were the children.

21 Q. It's the kind of thing that's so shocking it  
22 would be the kind of thing you would want to verify or  
23 confirm before you said it to millions of people;  
24 correct?

25 A. Again, Wolfgang Halbig was very pushy,

1 persistent on getting on the broadcast. You know, if he  
2 claimed that he had bombshell information Alex would  
3 have him on, but after a while, once the story kept  
4 developing, Wolfgang would send dozens of emails per day  
5 and they were all ignored to just general InfoWars box.

6 MR. BANKSTON: Okay. Objection,  
7 nonresponsive.

8 THE COURT: Sustained.

9 BY MR. BANKSTON:

10 Q. We didn't hear Wolfgang Halbig talk in that  
11 video, did we?

12 A. Well, he was the guest.

13 Q. Sure, I understand that. But we heard  
14 Mr. Jones say there are photos of kids who they said  
15 died who are still alive. That's what Mr. Jones said?

16 A. Correct.

17 Q. And Mr. Jones should have verified that if  
18 he was going to say something that outrageous. Right?  
19 Or do you not think so?

20 A. I'm -- I can't speak for him, I'm not sure  
21 what was going through his head at that time.

22 Q. Okay.

23 A. And the research that he had done.

24 Q. I would like to show you another clip from  
25 that same video. Again we're looking at September 25th,

1 2014, "Sandy Hook Deaths Missing From FBI Report."

2 Can we play clip 10B.

3 *(Video played off the record.)*

4 All right. Once again we're hearing this  
5 story about how the FBI said nobody died at Sandy Hook;  
6 right?

7 A. Correct.

8 Q. Okay. And that also, that would be pretty  
9 shocking if it was true, wouldn't it?

10 A. Yes. Very.

11 Q. Might be the kind of thing you would want to  
12 verify with the FBI, isn't it.

13 A. Well, Alex was relying on the writers, like  
14 he just mentioned in the video, and he, Alex, lets the  
15 writers do their own research and post a story and he  
16 doesn't really control what they write.

17 Q. And that wasn't verified with the FBI, was  
18 it?

19 A. I don't know if the writer verified it or  
20 not.

21 Q. Okay. Well, maybe ask him.

22 I would like to play another part of that  
23 episode.

24 Can we play clip 10C?

25 *(Video played off the record.)*

1                   Miss Karpova, in this video they talk  
2 about this helicopter footage of some people being  
3 detained in the woods?

4           A.     Correct.

5           Q.     And that it was taken at 12:23, hours after  
6 the shooting?

7           A.     Correct.

8           Q.     Okay. The company now understands that's  
9 reporters that were trying to get too close to the  
10 school?

11          A.     Correct.

12          Q.     Understands that was fully documented in the  
13 final report?

14          A.     Correct.

15          Q.     Okay.

16          A.     And this is a live show, Wolfgang was a  
17 guest and just spur of the moment. They didn't  
18 pre-plan. You know, the beauty of Alex Jones show is it  
19 is not a scripted show. So, whatever the guest says is  
20 what you get. This is why people actually tune into  
21 Alex Jones as opposed to CNN.

22          Q.     You describe that as beautiful?

23          A.     It's one of the -- the genuineness of the  
24 broadcast and Alex presenting what he believes at that  
25 time is what people are attracted to. He's not lying

1 about what he's saying.

2 Q. Now, you will agree with me that over the  
3 next few years that Mr. Jones, despite knowing from  
4 Wolfgang Halbig that that video was taken hours after  
5 the shooting, at 12:24, that Mr. Jones has repeatedly  
6 claimed that that video depicts second shooters dressed  
7 in SWAT gear being detained in the woods. You  
8 understand that?

9 A. I don't know if he knew that that was false  
10 video, and again because it's not -- it doesn't -- it's  
11 comprised of -- Sandy Hook comprised very little of his  
12 attention, you know, he's -- I don't know how much, you  
13 know, I don't know, I don't know if he -- I know for a  
14 fact that he wasn't lying when he was presenting that  
15 video. If he had remembered it wrong that's another  
16 story. And again I don't know.

17 Q. Okay. Would you agree with me that, around  
18 this time, anyway, the term "crisis actor" was  
19 frequently being used inside of InfoWars attached to  
20 this event?

21 A. Yes.

22 Q. Okay.

23 *(Discussion between counsel off the record.)*

24 MR. BANKSTON: No objection?

25 MR. REYNAL: No objection.



1 THE COURT: What number?

2 MR. BANKSTON: 55.

3 THE COURT: Plaintiffs' 55 is admitted.

4 *(Plaintiff's Exhibit 55 admitted.)*

5 BY MR. BANKSTON:

6 Q. All right. I'm going to show you 55, at  
7 least real quick. No body of this email, nothing right?

8 A. Correct.

9 Q. This is an email from Nico?

10 A. Yes.

11 Q. That's an InfoWars producer?

12 A. Yes. Used to be.

13 Q. That is to Rob Dew?

14 A. Yes.

15 Q. Rob Dew at this time, I believe, was the  
16 nightly news director?

17 A. I'm not sure exactly the dates of him being  
18 the director for nightly news, but I'll take your word  
19 for it.

20 Q. One thing we can probably agree is Rob Dew  
21 is a very high-level production employee at InfoWars.

22 A. He used to be.

23 Q. Used to be, okay.

24 Now, this email, it seems to have some  
25 attachments to it; right?

1 A. Yes. A PDF file.

2 Q. And then the subject says "Ebola Sandy Hook  
3 Crisis Actor Clips Attached." Correct?

4 A. Correct.

5 Q. Okay. Thank you, Miss Karpova.

6 Miss Karpova, I would like to show you  
7 what's already been marked as Plaintiffs' Exhibit 56, an  
8 article that was written by InfoWars.

9 This article was entitled "Internet  
10 Censors Viral Sandy Hook Truth Documentary." That's  
11 right?

12 A. Correct.

13 Q. And the date we see on there is  
14 December 9th, 2014; is that right?

15 A. Yes.

16 Q. All right. Let's pull up the first three  
17 paragraphs of this article.

18 I'm going to read this to you, okay? It  
19 states:

20 "Last Monday, an organization known as  
21 the Independent Media Solidarity released an  
22 epic documentary entitled, 'We Need to Talk  
23 About Sandy Hook,' which they hosted on their  
24 own site, as well as YouTube. Within hours of  
25 the video's upload, it was well on its way to

1           going viral. However, its success was short  
2           lived. Shortly after InfoWars began hosting  
3           the video, the following Tuesday morning, it  
4           was suddenly removed from YouTube due to a  
5           copyright claim by Lenny Pozner."

6                       Is that right?

7           A.     Yes.

8           Q.     Okay. And then you'll see in these articles  
9           their advertisements for the supplements that we've been  
10          talking about in this trial; right?

11          A.     Sure.

12          Q.     Okay. So, basically there had been some  
13          group of people who were trying to investigate Sandy  
14          Hook and they had published a documentary which had been  
15          quickly banned. And InfoWars decided it would  
16          distribute it using its platform; is that right?

17          A.     Correct, because we stand against  
18          censorship. And this is the point of the article is  
19          trying to say that, as soon as InfoWars posted it, it  
20          got removed.

21          Q.     Because InfoWars believes it should be able  
22          to publish false facts about anyone with no consequence;  
23          right?

24          A.     False.

25                       THE COURT: I'm sorry, what exhibit number

1 was that?

2 MR. BANKSTON: I'm sorry, Your Honor, that  
3 was 56.

4 THE COURT: Thank you.

5 BY MR. BANKSTON:

6 Q. Then on December 12th, 2014, on your list,  
7 InfoWars published a video entitled "Sandy Hook Film  
8 Censorship Efforts Backfire." Is that right?

9 A. That's the title.

10 Q. Right.

11 In that show, Mr. Jones brought on these  
12 YouTubers from Independent Media Solidarity to talk  
13 about their film. Is that right?

14 A. Probably.

15 Q. Okay. And Mr. Jones helped promote their  
16 efforts; is that right?

17 A. I believe Alex wanted to remedy the fact  
18 that they were censored.

19 Q. Around this time, I'm drawing your attention  
20 basically to December 2014, which is right around the  
21 second anniversary of the shooting, by this time people  
22 had been contacting InfoWars and warning them that what  
23 they were doing as it concerned Sandy Hook was very bad.  
24 You would agree with that?

25 A. I can't agree with that specific statement.

1                   *(Discussion between counsel off the record.)*

2                   MR. REYNAL: No objection.

3                   THE COURT: I don't know the number.

4                   MR. BANKSTON: I am going to bring you  
5 what I've marked as Plaintiffs' Exhibit 57.

6                   THE COURT: No objection?

7                   MR. REYNAL: No objection, your honor.

8                   THE COURT: Plaintiffs' 57 is admitted.

9                   *(Plaintiff's Exhibit 57 admitted.)*

10                  MR. BANKSTON: Thank you, Your Honor.

11 BY MR. BANKSTON:

12                  Q. And Miss Karpova, on this email I would like  
13 you to switch, go to the final page. And you'll see how  
14 that's the very end of an email; right?

15                  A. Appears so.

16                  Q. Okay. So, let's go back previous, one page,  
17 to the start of that email.

18                         Do you see where that email starts?

19                  A. Yes, I do.

20                  Q. Okay. Malisa, can you put Plaintiffs' 57 up  
21 on the screen.

22                         I'm going to read this to you, okay?

23                  A. Yes.

24                  Q. This is sent to InfoWars whistleblowers,  
25 whistleblowers@InfoWars.com; right?

1           A.     Yes.

2           Q.     Okay. This message reads:

3                     "To whom it may concern. I'm a writer  
4           whose articles have been featured on your  
5           website, InfoWars.com. I now primarily write  
6           for American Free Press. However, what I am  
7           writing to you now is not on their behalf.

8                     "I know Lenny Pozner personally.  
9           Mr. Pozner's son was brutally murdered on  
10          12/14/2012. I have met with this man and have  
11          seen verified documents that are indisputable  
12          proof that his son was murdered. I have also  
13          seen the email exchanges between himself and  
14          your staff. You told Mr. Pozner that Alex  
15          Jones acknowledged that children died and  
16          dismissed the idea of a hoax.

17                    "Now you are promoting the hoax mythology  
18          and entertaining individuals I can prove are  
19          frauds and child predators. I must warn you  
20          that you are traveling down a road that will  
21          ultimately lead to serious lawful consequences.  
22          Those you have placed your faith in are  
23          providing you with information that is  
24          verifiably false, and your ignorance to this  
25          fact is no excuse against your complicity.

1 "Think about what you are doing. You are  
2 willingly participating and facilitating in the  
3 defamation and libel of a man whose young child  
4 was brutally murdered and doing so at a time  
5 which we are approaching the second anniversary  
6 of this horrendous act. Think about that for a  
7 moment.

8 "I will do all in my power to assist  
9 Mr. Pozner and other victims of these deranged  
10 individuals who they have fallen prey to. To  
11 that end, I would ask that I be allowed to  
12 appear on your program and set the record  
13 straight on so much disinformation that is  
14 being spread about the SHES massacre.

15 "Please make the wise decision."

16 I read that correctly?

17 A. Yes.

18 Q. All right. Let's go up to the next email.  
19 All right.

20 This email is from Rob Dew; is that right?

21 A. Yes.

22 Q. Who we agreed is a high-production employee  
23 at InfoWars? At that time?

24 A. At that time.

25 Q. Okay. He says:

1           "Keith, can you be more specific of who  
2           you are referring to being frauds and child  
3           predators? You are warning us about talking  
4           about something and you work for the 'American  
5           Free Press'? Are we only allowed to talk about  
6           topics you approve?

7           "If you have undisputed proof about Sandy  
8           Hook, I would love to put it on our show.  
9           Threatening our organization to appear on the  
10          show is not the way to do it.

11          "Censorship is news, and people and  
12          organizations in Newtown have singled out a  
13          single video when there are millions of videos  
14          about the Sandy Hook incident. I never  
15          discount our government on the ability to  
16          murder, but when the act is pinned on a feeble  
17          kid carrying pounds of ammunition, firearms,  
18          and there is not one shred of video evidence  
19          that this person was inside or in front of the  
20          school, which has just upgraded its video  
21          surveillance system, then it's our duty to ask  
22          questions. When those who ask questions are  
23          attacked and their questions ignored, that only  
24          increases the likelihood of a coverup.

25          "Why is Sandy Hook the only event we were



1 not allowed to question?

2 "We can have you on Friday for the  
3 nightly news. We shoot interviews via video  
4 Skype.

5 "Thanks, Rob Dew."

6 I read that right?

7 A. You read the words right, but the tone you  
8 inflict on it just supposes that he's being snarky or  
9 some kind of condescending to this person. But he isn't  
10 at all.

11 Q. Okay. I mean --

12 A. I can read you the email in Rob Dew's voice,  
13 if you would like me.

14 Q. I don't need you to do a Rob Dew  
15 impersonation, no, ma'am.

16 Let's go to the next email. That one is a  
17 little hard to zoom because it's pretty much the whole  
18 page. So, I'm going to read it along with you,  
19 hopefully the jury can listen in on this. We got it a  
20 little bit better but we'll try to do what we can.

21 Rob says: "Thank you for your reply," or,  
22 I'm sorry, Keith Johnson says to Rob.

23 "Rob, thank you for your reply. I would  
24 love to be on the show Friday night, but I  
25 cannot use have Skype. I live in rural area of

1 Tennessee, must rely on HughesNet satellite,  
2 which causes a delay. If calling in by phone  
3 is not acceptable, I can try and make  
4 arrangements with a friend to use their Skype.

5 "Now, concerning some of the points you  
6 raised. For one thing, the security system was  
7 not upgraded in 2012. It was upgraded earlier  
8 than that, and I have proof. The letter  
9 referring to the upgrade was on the school  
10 website originally written in 2010. The video  
11 camera in use at the time had no recording  
12 feature.

13 "Adam Lanza was more than capable of  
14 carrying out the attacks, and I can explain why  
15 on your show. I also wrote an article recently  
16 with my interview with a prominent clinical  
17 psychologist on Asperger's and what impact it  
18 would have on Lanza's ability to carry out the  
19 attacks.

20 "Frauds? You are promoting Wolfgang  
21 Halbig, a man with less than a year of law  
22 enforcement as a ticket-writing Florida Highway  
23 Patrolman in 1974 and a 3.3-hour online  
24 certificate with NIMS. He claims to have been  
25 a homicide detective and a consultant on

1 Columbine. Both claims are false and I can  
2 prove it.

3 "I have documented multiple lies this man  
4 told. In addition, I have exposed the  
5 intentional manufacturing of evidence by Sandy  
6 Hook conspiracy theorists and have indisputable  
7 and documented proof of their frauds.

8 "Child predators? The dictionary  
9 definition of a predator, a person or group  
10 that ruthlessly exploits others. What else  
11 would you call those seeking to hunt down the  
12 children who sang at the 2013 Superbowl and  
13 stalks children at playgrounds in Newtown and  
14 plots ways to exhume the bodies of dead  
15 children? I have further information on that I  
16 can also share.

17 "Let's talk about censorship. Censorship  
18 is a function of government, not private  
19 industry. The videos that were taken down were  
20 done so after the complaints of copyright  
21 holders of photos and music were filed.

22 "As far as questions not being answered?  
23 Those questions have been answered, especially  
24 Wolfgang Halbig's notorious 16 questions.  
25 Myself and Sandy Hook researcher C. W. Wade

1 have both answered those questions.

2 "I will follow up this email with more  
3 information in the next few hours, but I wanted  
4 to get something out before the night expires.  
5 I have a few chores to attend to in the  
6 meantime.

7 "Thanks for your timely reply. Talk  
8 soon.

9 "Sincerely, Keith Johnson."

10 I read that correctly?

11 A. Yes.

12 Q. Okay. Now, InfoWars did eventually have  
13 Mr. Johnson on the show; right?

14 A. Correct.

15 Q. Had him there to do a debate with Wolfgang,  
16 didn't they?

17 A. That's what I recall.

18 Q. And Mr. Johnson tried to explain on InfoWars  
19 why Wolfgang was wrong, didn't he?

20 A. I can't recall specific details of the video  
21 again.

22 Q. Well, in any case, after that episode,  
23 InfoWars ultimately sided with Wolfgang, kept having him  
24 on the show and repeating the things he was saying;  
25 right?

1           A.    Are you referring to a specific video of  
2   Wolfgang after?

3           Q.    I'm asking you, Miss --

4           A.    After this debate?

5           Q.    Sure, I'm asking you, Miss Karpova, after  
6   2014 Wolfgang Halbig was on the show repeatedly  
7   throughout the next year, and InfoWars kept repeating  
8   his claims, repeatedly, until 2017, 2018. Can you agree  
9   with that?

10          A.    Are those the videos that you have here on  
11   the list?

12          Q.    Let's stop for just one second. I want to  
13   show you something else. That will hopefully help us  
14   with this.

15                   Miss Karpova, I'm approaching you with the  
16   notice that was given to you for the things you were to  
17   be prepared on to testify in this case. Okay?

18          A.    Yes.

19                   MR. REYNAL: I would object. At the  
20   deposition.

21                   MR. BANKSTON: Sure, sure, in her role as  
22   a corporate representative to provide testimony as a  
23   corporate representative. Okay?

24   BY MR. BANKSTON:

25          Q.    I would like you -- do you remember seeing

1 this notice?

2 A. Yes.

3 Q. Okay. Do you see how it has the topics at  
4 the bottom?

5 A. Yes.

6 Q. What's the number one topic?

7 A. Sourcing and research for the videos  
8 described in Plaintiffs' petition.

9 Q. After the preparation that you had done, are  
10 you telling me right now that you cannot tell me if  
11 between -- after 2015 InfoWars was still hosting  
12 Wolfgang Halbig and repeating the things he was saying.  
13 Are you not prepared to testify to that?

14 A. Again, I'm not sure the videos you're  
15 referring to. There are a lot of videos that InfoWars  
16 produces.

17 Q. They're in front of you.

18 A. Okay. So, these are the videos you're  
19 talking about.

20 Q. Well, certainly a lot of those happened  
21 after 2015, didn't you?

22 A. Well, you referred specifically to Wolfgang  
23 Halbig being in those videos and I can't remember  
24 specifically those instances.

25 Q. Why don't you take a look.

1 A. Okay.

2 Q. Take a look at the videos in 2015 for me.

3 Is Wolfgang Halbig in any of those videos,  
4 do you think?

5 A. Okay. So, there are a total of 1, 2, 3, 4,  
6 5, 6, 7 videos in, what -- I'm sorry, 1, 2, 3, 4,  
7 5 -- ten videos in the year 2015.

8 Q. And looking at those titles, you can tell me  
9 right now Mr. Halbig was in some of these. We're going  
10 to watch them in a minute.

11 A. Sure, let's watch them.

12 Q. Okay, let's do that, that's probably easier.  
13 We'll just see Wolfgang Halbig.

14 A. Yes.

15 Q. Around this time, at the end of 2014,  
16 InfoWars' corporate files had information showing that  
17 Wolfgang Halbig was harassing parents. Do you agree  
18 with that?

19 A. Could you repeat that again? I'm sorry.

20 Q. In 2014, at the conclusion of that year, by  
21 that point InfoWars had documents in its corporate files  
22 establishing the fact that Wolfgang Halbig was harassing  
23 parents. Do you agree with that?

24 A. I would just need to see the documents  
25 you're referring to, please.

1 MR. REYNAL: I'm going to object. This is  
2 not a corporate file.

3 MR. BANKSTON: Let's lay some foundation  
4 for that.

5 BY MR. BANKSTON:

6 Q. Miss Karpova, I'm going to show you this.

7 THE COURT: What's the number?

8 MR. BANKSTON: This is Plaintiffs'  
9 Exhibit 58.

10 THE COURT: Thank you.

11 BY MR. BANKSTON:

12 Q. Now, Miss Karpova, the first question I want  
13 to ask you is, do you see down at the bottom, it has a  
14 series of numbers on it; correct?

15 A. Yes.

16 Q. And those numbers say FSSTX-039550.  
17 Correct?

18 A. It does say that.

19 Q. Now, you know in dealing with the discovery  
20 in this case that what that is is a stamp that InfoWars  
21 put on the documents that it gave to the plaintiff. You  
22 understand that?

23 A. I assume so.

24 Q. You also, we saw this, we discussed this  
25 document in deposition; right?



1           A.     If you give me a second to go over the  
2 email.

3           Q.     Sure, why don't you go ahead and read the  
4 email just really quick to see if you remember us  
5 talking about it in deposition.

6           A.     (Witness complies.)

7                     Yes, I remember.

8           Q.     You remember discussing this email; right?

9           A.     Yes.

10          Q.     And you remember how we discussed how this  
11 email came out of InfoWars' corporate files. This  
12 resides in InfoWars corporate files.

13                   MR. REYNAL: Objection. Corporate files?  
14 That's vague, Your Honor. Object to it as vague.  
15 Corporate files.

16                   THE COURT: Well, I'm going to overrule  
17 it. She can answer the question if she knows the  
18 answer.

19                   THE WITNESS: Yes, so, the corporate --  
20 I'm not sure where the corporate files came from, and I  
21 surely don't for sure don't know if Alex had seen this  
22 email or --

23                   THE COURT: Okay. The question, the  
24 question, you need to focus on what the question --

25                   THE WITNESS: I'm sorry.

1 THE COURT: Please don't interrupt me.

2 You need to focus on the question you're  
3 asked, not just what you feel like saying. And the  
4 question, "You remember how we discussed how this email  
5 came out of InfoWars' corporate files. This resides in  
6 InfoWars corporate files." That was the question.

7 THE WITNESS: Correct. And I'm sorry, I  
8 just can't truthfully answer as to the nature of  
9 corporate files, judge. I'm sorry about that.

10 THE COURT: I don't want your apologies, I  
11 want you to have prepared the way I ordered you to  
12 prepare months and months ago, and I want you to answer  
13 the questions that are asked of you truthfully. So if  
14 the answer is "yes," if the answer is "no," if the  
15 answer is "I don't know," I just want the answer.

16 MR. REYNAL: Your Honor, I object to that  
17 instruction. Miss Karpova is not here as a corporate  
18 representative, she's here as an independent.

19 THE COURT: She's being questioned about  
20 her deposition testimony when she was a corporate  
21 representative. That's what this question referred to.

22 MR. REYNAL: I understand. I think she  
23 doesn't understand what a -- what the corporate files  
24 means.

25 THE COURT: She didn't say that. She

1 said, "correct."

2 I think we can move on. The answer was  
3 "correct." That's the answer we got.

4 MR. BANKSTON: Your Honor, at this time we  
5 would move to admit Plaintiffs' 58.

6 THE COURT: 58 is admitted.

7 *(Plaintiff's Exhibit 58 admitted.)*

8 MR. BANKSTON: Thank you, Your Honor.

9 Can we put 58 up.

10 BY MR. BANKSTON:

11 Q. Okay. And let's show this part first so you  
12 can see what it is first. I know this is going to be a  
13 hard email to read. But you see how this is from  
14 Wolfgang Halbig; correct?

15 A. Yes, it is.

16 THE COURT: She still has it in front of  
17 her, right?

18 THE WITNESS: Yes.

19 BY MR. BANKSTON:

20 Q. You still have the document in front of you?

21 And it's to, there's an email address of a  
22 person's name at something called Hager Sharp and an  
23 email address at Info@SafeandSoundSchools.org. Do you  
24 see that?

25 Q. Yes.

1 Q. This email is dated December 21st, 2014?

2 A. Yes.

3 Q. Okay. And the subject is, "I urge Michelle  
4 to stop using Josephine and making money and appearing  
5 on speaking engagements."

6 A. Yes.

7 Q. Is that what it says?

8 I'm going to read this email to you.

9 "Michelle, how could you and your  
10 husband, as responsible parents, even allow  
11 your precious child Josephine to attend that  
12 filthy and deplorable-looking school on  
13 December 14th, 2012. This school has, as you  
14 must have known, is and was a toxic waste dump  
15 as reported by the environmental consultants  
16 who requested more money from the city of  
17 Newtown leaders before demolishing the school  
18 and transported all the high levels of lead  
19 paint, high asbestos, and especially the high  
20 levels of PCBs in the groundwater at the Sandy  
21 Hook out of state.

22 "Josephine, your child, should have  
23 expected more from you before that tragic day  
24 as a parent. You were supposed to protect her  
25 from lifelong serious health -- lifelong health

1 risks when you send her to that school every  
2 day. Why would you, as a parent, and all those  
3 other parents --"

4 Miss Karpova, it would help if you would  
5 read along with the document so I can ask you if I've  
6 read it correctly.

7 A. I'm sorry, I just -- okay.

8 Q. (Reading:)

9 "Why would you, as a parent, and all  
10 those other parents who supposedly lost a child  
11 to gunfire allow their children, as you did, to  
12 serious toxic waste? This all unfolded before  
13 the first shot at the school even occurred.

14 "Did you not see the filth and deplorable  
15 conditions when you went to that school or are  
16 you blind? I do not understand, unless you  
17 explain it to me and the world, why you and  
18 your husband failed Josephine, who is a  
19 nonverbal child as you stated and depended on  
20 you for her safety.

21 "She needed you to protect her from all  
22 of the serious health risks that you sentenced  
23 her to on a daily basis. Now you talk about  
24 school security. You have got to be joking.  
25 You have all these experts on your staff who

1 are now part of your conspiracy. They should  
2 be ashamed in their actions in supporting you.  
3 A mom puts her own child at risk on a daily  
4 basis is now the expert on school security?

5 "I look forward in meeting you one day  
6 when I can take your deposition, not about the  
7 shooting, but why you and your husband failed  
8 Josephine by sending her to that filthy and  
9 deplorable school with all that toxic waste.

10 "We call this child endangerment when you  
11 know of danger that you expose your child to  
12 serious lifelong health risks. We must know  
13 without a doubt, because pictures do not --"  
14 and it says "li" and I believe that's "lie."

15 "You put her life in serious risk every  
16 day knowing how filthy and deplorable that  
17 school is. I am enclosing photos that you must  
18 recognize, since you took your child to that  
19 school, and having a child in special needs,  
20 you would expect a school environment and  
21 school climate that allows children to learn  
22 and teachers to teach."

23 Or it said "teachers to tech," but I think  
24 that's "teach." And then he says, "right?"  
25

1           "Please explain to me, if you can, why a  
2           school principal, Dawn Hochsprung, would allow  
3           her school to be so filthy and deplorable.  
4           There is not one female elementary school  
5           principal in this country that would allow her  
6           school to be that filthy and deplorable both  
7           inside and outside and, most of all, allow her  
8           school to become a toxic waste dump, placing  
9           every child in her school and staff in serious  
10          lifelong health risk. Right?

11           "All the pictures were taken by major  
12          crime squad from the Connecticut State Police.  
13          Please respond, since you are now the expert on  
14          school security."

15           "Wolfgang W. Halbig."

16           Did I read that; right?

17          A.    Yes, you read that right.

18          Q.    And Wolfgang had sent this email to the  
19          parents of a murdered autistic girl. You realize that?

20          A.    I realize that, and you were suppose -- yes.

21          Q.    Okay. So, InfoWars in its corporate files,  
22          had information as early as the end of 2014 that  
23          Wolfgang Halbig was doing this kind of thing. Do you  
24          agree with that?

25          A.    Could you specify "this kind of thing"?

1 Q. The email we just saw.

2 A. Correct. And you're classifying it as a  
3 harassment of the parents.

4 Q. I would. Sure.

5 But I'm just asking you, they knew about  
6 this. InfoWars knew about this.

7 A. I'm not sure who at InfoWars knew about  
8 this.

9 THE COURT: Is this a good time for a  
10 break?

11 MR. BANKSTON: It sure would be, Your  
12 Honor.

13 THE COURT: All right. This is going to  
14 be our morning break. It's 10:30. We'll return at  
15 10:50. So, we'll take a 20-minute break.

16 Jury, please remember all of my prior  
17 instructions about not discussing anything that's going  
18 on in the courtroom during the break. Thank you.

19 *(Brief recess.)*

20 THE COURT: You may resume.

21 MR. BANKSTON: Thank you.

22 BY MR. BANKSTON:

23 Q. Miss Karpova, before we had our break we had  
24 talked about an email from Wolfgang Halbig; correct?

25 A. Yes.



1 Q. And that was from December of 2014?

2 A. Yes.

3 Q. That InfoWars has.

4 You have that email, your company has it.

5 A. Again, truthfully, I'm not sure where the  
6 email came from, but.

7 Q. I'm not sure -- I'm not real interested in  
8 where it came from, I'm interested in the company gave  
9 it to me from its materials; correct?

10 A. I would assume so.

11 Q. Well, I'm not asking you to assume. Didn't  
12 you testify to me that you were personally involved in  
13 the discovery in this case and that you personally know  
14 that that stamp down at the bottom means that that was a  
15 document given by the company to me? You know that;  
16 right?

17 A. It appears so.

18 Q. Okay. And that email is Wolfgang Halbig  
19 harassing the parents of a murdered little girl. Right?

20 A. I can't agree with that statement.

21 Q. So, I want to make sure we have this clear  
22 for the jury. We just read this email about Wolfgang  
23 Halbig telling this mother how she failed her nonverbal  
24 child. And levelling all these accusations against her.  
25 To you, InfoWars eyes sees this email, that's not

1 harassment?

2 A. To me this seems like Wolfgang was a person  
3 who was very perturbed by the incident and horrified  
4 that, in his mind, the children were used for this  
5 tragedy, and he's trying his best to address the  
6 situation, is what it sounds like to me. And he  
7 certainly -- I don't feel like he believes that this is  
8 a parent who lost a child, and he is truthfully is just  
9 horrified that the children in his mind are being used.

10 Q. That's right. Because in this email, when  
11 he keeps on talking about, to Miss Gay, Josephine, your  
12 nonverbal child, and you failed Josephine in the  
13 shooting that day, the truth of it is he's mocking her  
14 because he doesn't believe that she had a child named  
15 Josephine. He doesn't believe there was a real child.  
16 That's correct; right?

17 A. I don't believe he's mocking her. I  
18 think --

19 Q. Okay.

20 A. He's just appalled.

21 Q. So am I.

22 Let's look at another video. I would like  
23 you to look at your list December 28th, 2014.

24 Do you see that?

25 A. Yes.

1 Q. Okay. So, we're still not even out of 2014  
2 yet and we have another video called, "America the False  
3 Democracy," right?

4 A. We did, yes.

5 Q. I would like to show you a clip from that  
6 video.

7 Can we play 12A.

8 *(Video played off the record.)*

9 Mr. Jones said, "The state police have  
10 gone public." Did you hear that?

11 A. Yes.

12 Q. What does that mean?

13 A. I'm not sure.

14 Q. Okay. Do you remember earlier we looked at  
15 the notice of the topics that you were supposed to  
16 prepare for when you were becoming a corporate  
17 representative; right?

18 A. Yes.

19 Q. One of those was the sourcing and research  
20 for the videos in Plaintiffs' petition; right?

21 A. Correct.

22 Q. And those claims that were made in those  
23 petitions; right?

24 A. Correct.

25 Q. And but, as far as Mr. Jones saying, "The

1 state police have gone public," you can't testify about  
2 what that's supposed to mean.

3 A. I have no idea what Alex is referring to.

4 Q. Okay. Would you at least agree with me that  
5 the state police of any state have not gone public  
6 saying that Sandy Hook is fake? You would agree with  
7 that; right?

8 A. I can't -- I don't know for sure.

9 Q. Okay. So, you're going to testify to this  
10 jury that you think, sitting on the stand today, that it  
11 might be possible that one of the state police forces of  
12 one of the 50 states came public and said Sandy Hook was  
13 fake. You think that's possible?

14 A. I'm trying to be as truthful and possible  
15 right now, and from my personal knowledge I can't make  
16 that definitive statement.

17 Q. That's fair enough. Okay.

18 You know about -- do you know about the  
19 article, "Sandy Hook Victim Dies Again in Pakistan."  
20 Are you familiar with that?

21 A. Could you --

22 Q. It's not a video, so it won't be on that  
23 list. I'm just asking if you're familiar with this  
24 article. It's a pretty eventful thing in InfoWars.

25 A. Would you refresh my memory, please.

1 Q. Sure. Do you remember the fact that  
2 Mr. Jones made the claim that a Sandy Hook victim, Noah  
3 Pozner, was actually also died again in a fake mass  
4 shooting in Pakistan. Do you know about that article?

5 A. Could you remind me the year of the article?  
6 Sorry.

7 Q. Yeah, right about right now when we're  
8 talking about, which is right at the end of 2014 to  
9 right at the beginning January 2nd or so of 2015. You  
10 remember that that was a big story being pushed on  
11 InfoWars, that Noah Pozner died again in a fake mass  
12 shooting a Pakistan; right?

13 A. I wasn't following InfoWars closely at that  
14 time and I wasn't working at the company yet, so I  
15 cannot testify to --

16 Q. So, again, with the topics that you were  
17 asked to prepare for, including the sourcing of the  
18 videos, if there's videos in this case talking about  
19 Noah Pozner dying again in Pakistan and this fake mass  
20 shooting in Pakistan, you can't testify about that, can  
21 you.

22 A. I'm not sure, sir.

23 Q. Okay. Well, I would like to show you a  
24 video from January 13th, 2013. You see that on the  
25 list; right?

1 A. Yes.

2 Q. Okay. And that episode is entitled "Why We  
3 Accept Government Lies."

4 A. Yes.

5 Q. Okay. I would like you to pay attention  
6 while I play you a clip from this video. And  
7 specifically there's a lot of things said in this video,  
8 right, so pay attention to all of it, but you're going  
9 to hear about this fake mass shooting in Pakistan,  
10 right, and about using the Sandy Hook victim's picture.  
11 I want you to watch that and see if it refreshes your  
12 memory on this controversy. All right?

13 A. Yes.

14 Q. So, let's play clip 13A.

15 *(Video played off the record.)*

16 Okay. The first thing I want to ask you  
17 about, you hear about the Pakistan thing?

18 A. Yes.

19 Q. Does that refresh you at all, what I'm  
20 talking about?

21 A. It's been a while since I've heard about  
22 that.

23 Q. Right. So, in other words, when you were  
24 preparing in this case for these videos that wasn't  
25 something you heard about, it's been a while since

1 you've heard about that?

2 A. Well, the sourcing, I was tasked to prepare  
3 with the sourcing of videos, and the sourcing in this  
4 case was Alex Jones' mind, because it wasn't anything  
5 that was prepared as a -- like before the -- I don't  
6 believe, I don't believe so, that it was a document that  
7 he was reading, but something from his mind, from his  
8 own research. And --

9 Q. Right. So as far as this thing about  
10 Pakistan and the sources of that --

11 MR. REYNAL: Your Honor, I'm going to  
12 object under CPLR 31.11 [sic] to evidence that doesn't  
13 go to compensatory damages. It's the section that says  
14 that we need to bifurcate the evidence that deals with  
15 punitive damages.

16 THE COURT: Right, no, I -- but where are  
17 you -- what rule are you putting me into? What do you  
18 want me to look at?

19 MR. REYNAL: The Civil Practice and  
20 Remedies Code.

21 THE COURT: Oh, I thought you said "LR,"  
22 and I was like, what is that? I have like 30 books, I  
23 don't have them all memorized.

24 All right, where do you want me to look?

25 MR. REYNAL: Civil Practice and Remedies

1 Code Section 31.

2 THE COURT: 31. Thank you.

3 Which part?

4 MR. REYNAL: Sub point 11.

5 THE COURT: 31.11? 31.011?

6 MR. REYNAL: Yes, 011.

7 THE COURT: Is that new? My book doesn't  
8 have that.

9 MR. REYNAL: Well, I will get it for Your  
10 Honor, if you would like.

11 THE COURT: I have a 31.10, 010, and  
12 that's it, it stops there.

13 MR. REYNAL: My objection, your honor,  
14 maybe this will make it easier, is this evidence that's  
15 being elicited does not go to the issue of compensatory  
16 and actual damages for the plaintiff, it is evidence  
17 that's solely designed to go to punitive damages and to  
18 attack the character and the reprehensibility of the  
19 conduct and, therefore, shouldn't be admitted at this  
20 point when we're supposed to be dealing with  
21 compensatory damages.

22 THE COURT: Overruled.

23 MR. BANKSTON: Your Honor, I would just  
24 request if we could maybe limit objections  
25 to evidentiary basis and not long, speaking objections.



1 THE COURT: Yes, please.

2 MR. BANKSTON: Okay. Thank you.

3 BY MR. BANKSTON:

4 Q. All right, Miss Karpova, we had seen in  
5 some of the last videos tag line at the top of the  
6 screen that said, "The Front Line the Truth Journalism."  
7 But we see a different tag line on the top of this  
8 screen; right?

9 A. Yes.

10 Q. And that says "InfoWars.Com, Because There  
11 is a War on For Your Mind." That's right?

12 A. That's been InfoWars' slogan.

13 Q. In this video that we just watched, do you  
14 recall him saying that there was an email from Michael  
15 Bloomberg telling his people, get ready in the next  
16 24 hours to capitalize on a shooting, do you remember  
17 hearing that?

18 A. He said something along those lines.

19 Q. Yeah. And that basically saying that  
20 Michael Bloomberg knew 24 hours before Sandy Hook that  
21 they were going to stage an event; right?

22 A. I'm not sure exactly what Alex meant by  
23 that.

24 Q. That's not something you can testify to  
25 today.

1 A. I'm not sure, sir. I don't want to --

2 Q. Would you agree with me it's pretty  
3 ridiculous to think the former mayor of New York,  
4 Michael Bloomberg, had an email that he sent out to his  
5 gun groups, his gun control groups? Would you agree?

6 MR. REYNAL: Objection. Argumentative.

7 THE COURT: Overruled.

8 BY MR. BANKSTON:

9 Q. You would agree with me that it is  
10 ridiculous that former mayor Michael Bloomberg sent out  
11 an email to his gun groups telling them all, get ready  
12 in the next 24 hours to capitalize on a mass shooting.  
13 That is ridiculous, you would agree with that?

14 A. I can't agree with that specific statement,  
15 sir.

16 Q. Okay. At the end Mr. Jones references that  
17 false mass shooting in Pakistan. You know that's about  
18 Noah Pozner; right?

19 A. Correct.

20 Q. Mr. Pozner complained about that, right, to  
21 YouTube?

22 A. You're referring to --

23 THE COURT: You're going to have to speak  
24 up a little bit.

25 THE WITNESS: Are you referring to a

1 specific document?

2 BY MR. BANKSTON:

3 Q. No, I'm not. I'm asking you, do you know  
4 Mr. Pozner complained about that story to YouTube? Do  
5 you know that?

6 MR. REYNAL: I'm going to object again,  
7 Your Honor, under the Civil Practice and Remedies Code  
8 Chapter 41.011.

9 THE COURT: I'll look. But your objection  
10 is the same; right?

11 MR. REYNAL: Yes.

12 THE COURT: Yeah, overruled.

13 MR. BANKSTON: Thank you.

14 MR. REYNAL: May I have a running  
15 objection, your honor?

16 THE COURT: You may.

17 MR. REYNAL: Thank you.

18 BY MR. BANKSTON:

19 Q. Do you remember one of the videos you were  
20 supposed to get prepared for was on February 12th, 2015?

21 A. It says "Title Unknown."

22 Q. That's correct. Because you didn't give us  
23 this video, right? We had to go find it. And we don't  
24 know its title. Did you understand that?

25 A. That's what I assume.

1 Q. Yeah, we got lucky and we found it. And I  
2 want to play a clip of this video for you now.

3 This is something you reviewed for your  
4 preparation; correct?

5 A. Will you show it to me to refresh my memory?

6 Q. Well, let's ask you this, are you now  
7 telling me there are videos in the Plaintiffs' petition  
8 that, despite the Court's instruction, you did not  
9 review?

10 A. I just don't remember which videos I  
11 reviewed and which were available to me to review.

12 Q. Okay. Well, if it's on this list you should  
13 have reviewed it; right?

14 A. Again, sir, I'm -- the videos that were  
15 available to me I did review.

16 Q. Okay. Can you tell me if the videos that  
17 were available to you, that were made available to you,  
18 are all the videos in Plaintiffs' petition? Do you know  
19 that?

20 A. Are you referring to all these videos?

21 Q. Well, I'm asking what you prepared on.

22 Miss Karpova, I'm having a hard time  
23 understanding what exactly you prepared on, and what I'm  
24 trying to figure out is do you know if the videos that  
25 were provided to you by whoever provided them to you to

1 get prepared, were they all the videos in Plaintiffs'  
2 petition? Did you do anything to verify that?

3 A. I'm not sure, sir.

4 Q. Okay. Well, I would like to play you a clip  
5 from this video, and I assume you've seen it and  
6 prepared on it but we're going to play it, okay. And  
7 we're going to play right now from February 12th, 2015.  
8 As we stated, the title is unknown, but we're going to  
9 play clip 14C.

10 *(Video played off the record.)*

11 Mr. Jones' concern was that complaints  
12 from the parents could potentially shut down the  
13 company's YouTube channel; right?

14 A. One of the concerns in this video.

15 Q. Correct. That's in the clip we just saw?

16 A. Yes.

17 Q. Okay. Like to play for you now clip 14D.

18 *(Video played off the record.)*

19 One thing we can see at the end of this  
20 clip is that Mr. Jones decided when a parent complained  
21 he was going to put that parent's name and email out to  
22 millions of people. We can agree on that?

23 A. Well, I believe that's public record when  
24 the complaint is sent. I'm not sure what you --

25 THE COURT: Miss Karpova, I want you to

1 listen to the question and answer the question that  
2 you're asked. Mr. Reynal will ask you questions later,  
3 but right now you have to answer Mr. Bankston's  
4 questions.

5 BY MR. BANKSTON:

6 Q. This was a notification from YouTube sent to  
7 InfoWars. Do you see that?

8 A. Yes.

9 Q. Okay. And not sent to the public, sent to  
10 InfoWars. Do you agree with that?

11 A. Yes.

12 Q. Okay. And InfoWars decided to take this  
13 notification they had been given from YouTube and put it  
14 on the air with Lenny Pozner's name and his email  
15 address. That happened; right?

16 A. With the claimants, yes.

17 Q. Yes. Okay.

18 And also, Mr. Jones says during this that,  
19 "I want to be careful." Did you hear him say that?

20 A. I did.

21 Q. That's not truth, he's being the exact  
22 opposite throughout all of these videos we're seeing;  
23 correct?

24 MR. REYNAL: Objection, your honor. She's  
25 not here to judge whether he's being truthful or not.

1 THE COURT: What's the legal objection,  
2 Mr. Reynal?

3 MR. REYNAL: Calls for speculation, Your  
4 Honor.

5 THE COURT: All right. Overruled.

6 THE WITNESS: What's the question again?

7 BY MR. BANKSTON:

8 Q. Can I have that read back?

9 *(The record was read as requested.)*

10 A. No, I -- I think he's trying to be as  
11 truthful or as careful as he can.

12 Q. Okay. He was saying in there, "We're not  
13 even saying in that headline that children weren't  
14 killed." You heard him say that?

15 A. Yes.

16 Q. Yeah.

17 In fact, what he's saying, didn't the  
18 headline say Noah Pozner died twice. Right? That's  
19 what it said.

20 A. Yes.

21 Q. Okay. I want to play you another clip.

22 You understand, like we talked earlier,  
23 that Mr. Jones will sometimes have people who make  
24 YouTube videos who have been featured on the show, he'll  
25 sometimes invite the people who made those YouTube

1 videos that were featured, he'll invite them on the show  
2 to talk. That's happened before.

3 A. I would say occasionally.

4 Q. Sure. Okay. Well, I want to show you  
5 something like that; right?

6 A. Yes.

7 Q. Let's play clip 14H of Mr. Jones talking to  
8 people who were trying to get their YouTube videos on  
9 his show.

10 THE COURT: Just a second. Can you  
11 approach real quick?

12 MR. BANKSTON: Sure.

13 *(Whereupon a discussion was held at the*  
14 *bench off the record.)*

15 MR. BANKSTON: That's okay, Your Honor,  
16 we'll get that figured out and if we need to come back  
17 and revisit it we can.

18 THE COURT: If you want to admit it now,  
19 we will.

20 *(Discussion between counsel off the record.)*

21 THE COURT: Is it part of PVX 14?

22 MR. BANKSTON: Correct. I just want to  
23 make sure it's been disclosed to defendants.

24 MR. REYNAL: Yes, that's fine.

25 THE COURT: All right. Then, that's fine.



1                   *(Plaintiff's Exhibit PVX 14 admitted.)*

2                   Just before you start it I just want to  
3 explain to the jury, sometimes you'll see exhibits have  
4 to be admitted in court and sometimes we've agreed in  
5 advance that they're already admitted. But I keep track  
6 of everything that's done. So, that's all that's  
7 happening right now.

8                   All right, go ahead.

9                   MR. BANKSTON: All right. Can we go ahead  
10 and play now clip 14H.

11                   *(Video played off the record.)*

12 BY MR. BANKSTON:

13                   Q. During that clip, Mr. Jones said, about the  
14 parents who were complaining, "They made a major mistake  
15 involving us." That's what he said?

16                   A. I'm not sure who Alex is referring to  
17 that -- that made a mistake.

18                   Q. He's talking about this network of people,  
19 right? Who complained?

20                   A. Well, I think the caller is concerned here  
21 with the trolls that he's being attacked with, as well  
22 as his family, and that's what he's raising with Alex.  
23 And to my understanding from this clip is that he's  
24 saying he doesn't appreciate, you know, having been  
25 entangled in this by the trolls who, again, post to the

1 website, perhaps.

2 Q. Make sure I understand. This caller who had  
3 been posting videos with murdered parents' children in  
4 them and calling them fake, who had now been getting  
5 complaints from Mr. Pozner, that person was mad that he  
6 got entangled in this. That's what you're telling me?

7 A. I'm not sure what this caller was doing.

8 Q. Okay. Well, let's talk about Mr. Jones,  
9 then, because he said, "They made a major mistake  
10 involving us." You agree that's what he said?

11 A. He did say that.

12 Q. Okay. And here is the other thing I want to  
13 ask you about. Alex Jones said, "I'm not somebody to  
14 mess with." That's true, isn't it?

15 A. He did say that.

16 Q. And it's true, right? You don't want to  
17 mess with Alex Jones.

18 A. I'm not sure what he meant by that.

19 Q. Okay.

20 A. I think he means that he's not going to  
21 stop, he is not going to shut up. That's his weapon is  
22 his speech.

23 Q. Let's see how he uses that weapon. Let's  
24 check that out on the next clip.

25 Malisa, can you play for us clip number

1 PVX 14I.

2 *(Video played off the record.)*

3 That was Mr. Robert Dew talking; right?

4 A. Yes.

5 Q. Okay. So, in terms of Mr. Jones using his  
6 speech he has, which you say is his weapon, when a  
7 parent of murdered children complained, the way  
8 Mr. Jones used that speech as a weapon is by showing  
9 literal maps to where they picked up their mail to all  
10 of his followers. That's what he did with his weapon of  
11 speech; right?

12 A. I wouldn't agree with that statement, sir.

13 Q. All right. Well, let's just make that  
14 really simple. We just saw, and the jury saw, too,  
15 after these complaints and he said, "I'm not somebody to  
16 mess with," the next thing that happens on InfoWars  
17 later on that broadcast is him putting up literal maps  
18 to where these people pick up their mail. That  
19 happened, right?

20 A. Well, I think what Rob Dew was doing here is  
21 looking up the business name or the organization name  
22 that's filed the complaint and researching into it, so.

23 Q. Yeah, you know, a father, Lenny Pozner, had  
24 created a name called HONR Network to try to be a little  
25 more anonymous when he was making these complaints. Did

1 you know that? You heard about that?

2 A. Correct, we know that now.

3 Q. Yeah.

4 And you all knew Lenny Pozner was running  
5 the HONR Network, they showed it earlier on the clip;  
6 right?

7 Miss Karpova, we saw his email address,  
8 right?

9 A. The HONR Network, yes. The address and the  
10 email.

11 Q. And you saw Lenny Pozner's name; right?

12 A. Yes.

13 Q. And you know down there in Florida, what he  
14 showed, that's where Lenny Pozner was picking up his  
15 mail.

16 A. I'm not sure if that address was public,  
17 because the way they were able to find it, the  
18 organization's address, and that's what he was showing  
19 on air.

20 MR. BANKSTON: Objection. Nonresponsive.

21 THE COURT: Sustained.

22 BY MR. BANKSTON:

23 Q. They showed maps to where Lenny Pozner was  
24 picking up his mail, correct?

25 A. Yes.

1           Q.    One thing we definitely know, I know you're  
2   saying you don't know it was public, it was definitely  
3   public after that, wasn't it, to millions of people.

4           A.    Well, I'm assuming it was public, that's how  
5   he was able to find it and it was on Google Maps and  
6   what he was showing --

7           Q.    Miss Karpova, can I please remind you, do  
8   not assume anything.

9                    You don't know for a fact where that came  
10   from, do you?

11          A.    I'm trying my best to answer your question.

12          Q.    Would you please agree with me that when I'm  
13   asking you a question and you're testifying under oath  
14   about the truth, can you please just not assume things.  
15   Will you make that agreement with me?

16          A.    Yes, sir.

17          Q.    Okay. You understand this trial is very  
18   important; right?

19          A.    Very important.

20          Q.    Okay. And so I definitely want to make sure  
21   that you're not saying anything that you cannot say  
22   under oath. Do you understand that?

23          A.    Absolutely.

24          Q.    Okay. I want to show you another clip from  
25   this. Let me show you a very short clip at the end of

1 this discussion that they're having.

2 PVX 14J.

3 *(Video played off the record.)*

4 So, Mr. Jones says essentially, because  
5 Mr. Dew is confused that Mr. Pozner is using a UPS box  
6 and that he doesn't have a memorial set up or something,  
7 he's confused. Because of that Mr. Jones says he needs  
8 to go down to Florida and investigate this; right?

9 A. I'm not sure if I agree with that  
10 statement --

11 Q. Okay.

12 A. -- fully, sir.

13 Q. That's fine.

14 Let's move into 2015 a little bit later.  
15 Let's go to March 2015. All right. On March 4th, 2015,  
16 there's another video; right?

17 A. Yes.

18 Q. Okay. And that is called "New Bombshell  
19 Sandy Hook Information in-bound;" right?

20 A. Yes.

21 Q. And I know in the last few videos where  
22 we've been seeing Mr. Jones talking about the incident  
23 being totally synthetic, completely manufactured, that  
24 kids didn't die, these last few videos we haven't been  
25 seeing a lot of Halbig. But in this video here about

1 the bombshell information this is Halbig we're going to  
2 be talking about; right?

3 A. I'll take your word for it.

4 Q. Well, let's look at a video. Let's show you  
5 a clip from that as PVX 15B.

6 *(Video played off the record.)*

7 All right. Miss Karpova, first of all, at  
8 this point in 2015, InfoWars had already had possession  
9 of the state's attorney's release of the official Sandy  
10 Hook files and the report since 2013, for all of that  
11 time since, up until this video, it has had those  
12 materials. Do you agree with that?

13 A. I can't agree with that specific statement,  
14 sir.

15 Q. Well, didn't we just put at the beginning of  
16 your testimony these Requests For Admissions that you  
17 were involved with in the discovery, and we went through  
18 them all and see that it was admitted that the company  
19 did, in fact, possess that report in December of 2013.  
20 You remember we did that?

21 A. Correct. But if you're referring to who at  
22 the company had them, I have no idea who saw it.

23 Q. Okay. I don't need to know a specific  
24 person. We know that the information was in the  
25 company's possession as of 2013; right?

1           A.     It appears so.

2           Q.     Okay. And now we have in this video  
3 Mr. Jones saying the place was falling apart in the  
4 photos and the videos that we saw didn't look like a  
5 real school.

6                     What I want to ask you, Miss Karpova, is,  
7 in getting prepared to testify, in getting prepared to  
8 be a corporate representative, is it your belief that,  
9 if we were to show this jury those photos and those  
10 videos taken inside of Sandy Hook that day, do you  
11 believe it would show that it doesn't look like a real  
12 school; that it's falling apart. Do you know?

13           A.     The photos that Alex was referring to, I  
14 believe so, yes.

15           Q.     Okay. So, you think -- let me tell you,  
16 we're going to -- you think when the jury sees the  
17 photos of the inside of the school and see the video of  
18 the inside of the school, they're going to think this  
19 was not an operating school.

20           A.     I just said the photos and the videos that  
21 Alex saw that he was referring to.

22           Q.     What are those?

23           A.     I'm not sure.

24           Q.     And you were responsible for the sourcing  
25 and the research on Plaintiffs' petition?



1           A.    I couldn't find them. That's something that  
2 Alex had done his research on.

3           Q.    You didn't even talk to Alex, did you.

4           A.    I don't remember.

5           Q.    Didn't you testify yesterday in getting  
6 prepared for your corporate representative to testify  
7 about these topics you didn't even talk to Alex.

8           A.    Specifically not for that.

9           Q.    And you're telling me that all this stuff is  
10 coming right out of his brain. Right?

11                   Right?

12           A.    That's how he normally does it. He does  
13 previous research at home or right there on air.

14           Q.    Do you think it's fair that these parents  
15 now have their day in court and we're asking for this  
16 information, and when you were ordered to prepare  
17 yourself on this information that you didn't? That you  
18 didn't even talk to Mr. Jones? Do you think that's fair  
19 to them?

20                   MR. REYNAL: Objection to the relevance,  
21 Your Honor, of discovery issues that have happened in  
22 this case.

23                   THE COURT: You know what, I'm going to  
24 sustain the objection for now. But if we can't get  
25 answers to the things she was supposed to be able to

1 answer, I might -- I might allow it later.

2 MR. BANKSTON: Thank you, Your Honor.

3 THE COURT: So, sustain for now.

4 BY MR. BANKSTON:

5 Q. I want to show you another clip from this  
6 March 4th, 2015, video called, "New Bombshell Sandy Hook  
7 Information in-bound."

8 Play the clip 15D.

9 *(Video played off the record.)*

10 Miss Karpova, there was a lot said there,  
11 but what I really want to ask you about is this, I wrote  
12 it down here: Mr. Jones said, "And then they bring in  
13 all the actors to break down and cry and they think  
14 we're so stupid that they use the same actors as  
15 different people." You heard that?

16 A. Yes.

17 Q. What people who were -- supposedly played  
18 the different people that were supposedly played by the  
19 same actor, who was that?

20 A. It's hard to say who he's referring to here.  
21 I don't know.

22 Q. It would definitely be hard to say if you  
23 didn't talk to Mr. Jones and prepare; right?

24 A. I did prepare the best I could.

25 MR. REYNAL: If I may, Your Honor, and I

1 think that -- she's not here as a corporate  
2 representative. She gave a deposition as one. If they  
3 want to play the deposition, that's different. This is  
4 inappropriate. She wasn't supposed to be here as a  
5 corporate representative.

6 THE COURT: Are you objecting to this last  
7 question?

8 MR. REYNAL: Yes, I'm objecting to this  
9 last question, this entire line of questioning about  
10 corporate representative stuff.

11 THE COURT: Well, you're actually  
12 objecting to a sidebar, and I will sustain the objection  
13 to a sidebar.

14 MR. BANKSTON: Understood, Your Honor.

15 THE COURT: Ask a question.

16 MR. BANKSTON: Understood. And again, if  
17 I could re -- hopefully we can limit speaking  
18 objections.

19 THE COURT: Yes.

20 BY MR. BANKSTON:

21 Q. Let's talk about another clip in this video,  
22 okay. And I want you to pay attention to what  
23 Mr. Halbig is saying. In this video we're going to hear  
24 from Mr. Halbig. This is clip 15G.

25 Can we play that?

1                               *(Video played off the record.)*

2                               Miss Karpova, I want to ask you something  
3 very specific about what Mr. Jones said, or, I'm sorry,  
4 about what Mr. Halbig said. Did you hear the portion  
5 where he was sort of praising InfoWars?

6                               A.     Yes.

7                               Q.     Okay. And in that clip he said, "Support  
8 InfoWars because, if we don't have your voice, nobody is  
9 going to hear the truth." That's what Mr. Halbig said?

10                              A.     He did say that.

11                              Q.     Mr. Halbig doesn't have a media company,  
12 does he?

13                              A.     I don't believe so.

14                              Q.     He doesn't appear in front of an audience of  
15 millions, does he, unless he is on InfoWars; right?

16                              A.     I believe he's been on other shows, before,  
17 as well.

18                              Q.     Where has he appeared in front of millions  
19 of people, Miss Karpova?

20                              A.     I'm not sure. I wasn't -- I'm not sure  
21 right now.

22                              Q.     All right. Because you would agree with me  
23 that nobody in this country, nobody who runs a media  
24 empire with millions of viewers, would ever put Wolfgang  
25 Halbig on its shows other than InfoWars; right?

1 A. I don't know that.

2 Q. Okay. But, according to Mr. Halbig, if  
3 InfoWars isn't out there, if InfoWars isn't helping  
4 Mr. Halbig get his message out, nobody is going to hear  
5 the truth, according to Mr. Halbig. That's what he  
6 said?

7 A. That's something that pretty much every  
8 guest we have on say, and they also ask for donations.

9 Q. I bet. I bet those people want that  
10 audience and, in fact, that's what was happening here is  
11 even Mr. Jones was saying, folks need to donate; right?

12 A. Yes.

13 Q. Mr. Jones was helping raise money to let  
14 Mr. Halbig do all of the things that we've been seeing  
15 him do. Right?

16 A. Well, Alex just likes to help the little guy  
17 because he doesn't, you know, his time, at the time in  
18 his opinion and he, Alex, always states that it's  
19 according to him, it's his opinion, that Wolfgang was  
20 not getting a big national attention and he was trying  
21 to help him out.

22 Q. Let me make sure I understand you. Alex  
23 likes to support the little guy; right? That's what you  
24 said?

25 A. Yes.

1 Q. And in this case, the little guy is the guy  
2 that was sending harassing emails to the parents of  
3 murdered children. That's right?

4 A. Again, I do not agree with your assessment  
5 that it's a -- was a malicious, harassing email.

6 Q. Okay. Let's play another clip from that  
7 same episode, and let me just repeat that for the jury,  
8 "New Bombshell Sandy Hook Information in-bound," on  
9 March 4th, 2014.

10 Let's play clip 15F.

11 *(Video played off the record.)*

12 I heard there Mr. Jones talking about how,  
13 "They traumatized us, the people who did Sandy Hook,  
14 they traumatized us." Did you hear that?

15 A. Yes.

16 Q. And did you hear in the earlier clip when  
17 Mr. Jones and Halbig were talking about how this event  
18 was calculated to inflict emotional distress on the  
19 public. Do you remember him saying that?

20 A. Yes.

21 Q. Okay. Is it, I want to know, is it the  
22 company's current position that Neil and Scarlett were  
23 involved in fakery, are not real parents, and inflicted  
24 emotional distress on the company? Is that the  
25 company's position?

1 MR. REYNAL: Objection. She's not a  
2 corporate representative, Your Honor.

3 MR. BANKSTON: I'll ask it to her  
4 personally.

5 THE COURT: I mean, did you ask it at the  
6 deposition? I don't know.

7 MR. BANKSTON: Yes, but I'm not sure I  
8 want to go into that right now.

9 THE COURT: All right.

10 BY MR. BANKSTON:

11 Q. But I'll ask it to you personally, from your  
12 personal perspective what do you think?

13 A. Could you repeat that again?

14 Q. Yeah, do you believe Neil and Scarlett,  
15 right here, do you believe these two people are fake  
16 parents who inflicted emotional distress on America? Is  
17 that something you believe, Miss Karpova?

18 A. I don't believe that and I believe that  
19 their grief is being used and they're being lied to.

20 Q. By who?

21 A. By Mr. Jones is their enemy when he's not.  
22 You're their enemy because you're lying to them and  
23 you're using their grief to make bank with lies and law  
24 fair [ph]. And I think this reasonable jury here will  
25 see that, that the truth is on our side in this case.

1 Q. They'll see that the things you're saying  
2 here today are reasonable, good things to do. Is that  
3 what they'll see?

4 A. They will see that Alex meant everything  
5 from his heart and he never claimed something for sure,  
6 it was his opinion, he stated it every time and he was  
7 trying to do honest investigative research to the best  
8 of his ability and that's his job. And he takes it very  
9 seriously. And that's why people love him.

10 Q. Now, I remember you also were saying that  
11 you, in attempting to meet your responsibilities as the  
12 corporate representative, you did the best you could;  
13 right? You remember saying that?

14 A. Yes, I did.

15 Q. And the best you could do to prepare for the  
16 things that Alex Jones said that were from him didn't  
17 even include talking to Alex Jones, that was the best  
18 you could do. Is that what you're telling us?

19 A. I -- I did the best that I was advised to  
20 do, and I did that.

21 Q. You were advised not to speak to Mr. Jones  
22 then, weren't you.

23 A. I wasn't advised to --

24 MR. REYNAL: Objection, your honor. I  
25 think that we're getting into attorney-client privilege



1 stuff. She's not here as a corporate representative,  
2 the questions are argumentative.

3 THE COURT: I would like to move on from  
4 that advice.

5 MR. BANKSTON: Sure. Absolutely.

6 Let's move onto a new exhibit.

7 BY MR. BANKSTON:

8 Q. I want to -- you remember, we were talking  
9 in this video or they were talking in this video about  
10 Mr. Halbig bringing a lawsuit in Seminole County,  
11 Florida?

12 A. Yes, he did say that.

13 Q. Okay. And you understand that the company  
14 got email information from an outsider that told them  
15 that there was a good chance Mr. Halbig might be lying  
16 about that entire legal proceedings. Do you remember us  
17 talking about that?

18 A. Yes, the email.

19 Q. Okay. I would like to show that to you now.

20 This, Your Honor, is going to be 62.

21 MR. REYNAL: I'll object. Hearsay, Your  
22 Honor.

23 MR. BANKSTON: Let me give you a copy,  
24 Your Honor.

25 THE COURT: I have a copy.

1 MR. BANKSTON: Okay. And our response is  
2 not for the truth of the matter asserted, warning to the  
3 company, something they needed to investigate.

4 MR. REYNAL: I will not object to it on  
5 that basis.

6 THE COURT: I'm sorry?

7 MR. REYNAL: I said, if they're not  
8 offering it it for the truth, then I'm fine with that.

9 THE COURT: All right, then 62 is  
10 admitted.

11 *(Plaintiff's Exhibit 62 admitted.)*

12 MR. BANKSTON: Thank you, Your Honor.

13 BY MR. BANKSTON:

14 Q. Miss Karpova, I'm going to hand you what's  
15 been marked as Exhibit 62.

16 Malisa, would you mind putting 62 up for  
17 me. Let's go into the very top email, the one that's  
18 just one line long. Can we bring that up?

19 Now, Miss Karpova, there's a first email  
20 here from Nico, right, that's an InfoWars producer at  
21 the time?

22 A. Yes.

23 Q. And that is to Rob Dew, and then we're not  
24 sure what his job function was in 2015 but definitely a  
25 high-production person inside of InfoWars?

1 A. Again, I'm not sure what his job was --

2 Q. Right.

3 A. -- at that particular time.

4 Q. But we can agree, have agreed in this  
5 courtroom several times now, he was high-production  
6 employee at InfoWars?

7 A. Yes.

8 Q. Yes. Okay.

9 And he is emailing to Rob, saying, here  
10 are some comments on Halbig's last interview from a law  
11 student; right?

12 A. Yes.

13 Q. All right. Let's pull up that second email.

14 A. It says, and you can go down this email with  
15 me, it says:

16 "Madam or sir, I am in my final semester  
17 of law school. I listened to the Wolfgang  
18 Halbig video and some significant alarm bells  
19 went off. I also wrote on the YouTube page  
20 that I copy and paste here.

21 "Okay. So, just so I get this straight,  
22 starting at 31:30, he filed his lawsuit in  
23 Seminole County court in Florida? Not federal  
24 court in Florida, but state court? There is a  
25 legal requirement called 'standing.' He does

1 not have the standing to sue in Seminole County  
2 court. He was not a party to the shooting in  
3 any fashion.

4 "There is also a concept called  
5 'jurisdiction.' Either the man is lying, or  
6 the judge is insane. A Florida county-level  
7 judge would would not have jurisdiction for any  
8 reason other than a contract, tort, or crime  
9 issue directly involving Mr. Halbig.

10 "Something is completely wrong here. Had  
11 he said in the Federal District of Florida, or  
12 whatever district it might be if the state is  
13 split, that may at least be plausible. This is  
14 completely insane and cannot go anywhere but  
15 into a trash can -- the trash can. No  
16 standing, no subject matter jurisdiction, no  
17 personal jurisdiction.

18 "Two cents from a third-year law student  
19 who is legally current in his education.

20 "This man seems to be grasping and  
21 stretching. No judge in their right mind would  
22 do such a thing as he describes.

23 "Here is an example. Imagine there's a  
24 crime in Las Vegas and the criminal kills  
25 himself. There is no law whatsoever that would

1 allow Alex or anyone else to file suit in San  
2 Antonio for anything regarding the crime in Las  
3 Vegas. There is no claim that could be made in  
4 Texas for something that happened in Nevada.  
5 It's a rule.

6 "Signed, R. Darren Blumfield,"

7 Who was apparently at that time at the  
8 William S. Boyd School of Law.

9 I read that email correctly?

10 A. Apparently.

11 Q. Okay. And so, Nico had actually brought  
12 this to Rob's attention; right?

13 A. Yes.

14 Q. Okay. So, the company was on notice that  
15 there might be some significant problems with the things  
16 that Wolfgang Halbig was saying. That's what this email  
17 was saying; correct?

18 A. Nico had forwarded this email to Rob Dew.  
19 What happened to it afterwards, I don't know.

20 MR. BANKSTON: Objection, nonresponsive.

21 THE COURT: Sustain.

22 BY MR. BANKSTON:

23 Q. Miss Karpova, I'm not asking you about what  
24 happened with the forwarding, I'm asking you, InfoWars  
25 had received an email in its possession that had been

1 discussed among -- had been forwarded among these  
2 production employees that suggested that the things that  
3 Mr. Halbig were saying in his interview were insane;  
4 right?

5 A. Yes, appears so.

6 Q. Okay. I want to go back to the day that  
7 Mr. Halbig came on the show right before that email.  
8 And that was the video we were just watching, March 4th,  
9 2015. So, I want to go back from the sense of how he  
10 got on that show.

11 Now, I think you know that, in making  
12 arrangements for getting on the show and those sort of  
13 things, run through a producer, in this case Nico;  
14 right?

15 A. Yes.

16 Q. Okay.

17 *(Discussion between counsel off the record.)*

18 MR. REYNAL: No objection.

19 THE COURT: Plaintiffs' 61 admitted.

20 *(Plaintiff's Exhibit 61 admitted.)*

21 MR. BANKSTON: Thank you, Your Honor.

22 BY MR. BANKSTON:

23 Q. I've handed you what's been marked as 61.

24 MR. REYNAL: Your Honor, I'm saying no  
25 objection, no objection subject to my prior objection

1 regarding Chapter 41 of the Civil Practice and Remedies  
2 Code.

3 THE COURT: Which is overruled.

4 MR. REYNAL: Thank you.

5 BY MR. BANKSTON:

6 Q. Let's start at the bottom email. Wolfgang  
7 is writing to Nico here; right?

8 A. Yes.

9 Q. You know who Nathaniel is? Somebody at  
10 InfoWars; right?

11 A. I don't recognize that name at all.

12 Q. Well, in any case, Nico is the producer he's  
13 working with that day; right?

14 A. Appears so.

15 Q. Okay. And he says, "Nico, the picture of  
16 the Sandy Hook Elementary School choir is one of the  
17 keys." And then he says, "other pictures are great for  
18 discussion, these are the CT," and I believe that's  
19 probably "Connecticut", "crime pictures." And he signs  
20 it Wolf.

21 Read that correctly?

22 A. Yes.

23 Q. Okay. And then let's go up to the next  
24 email.

25 Nico's response. And he says:

1 "Got the Superbowl picture. Thank you for  
2 sending. Will you be calling on Skype at 1:00 p.m.  
3 Eastern Time? How long will you be available for the  
4 interview today? Thanks. Nico."

5 I read that correctly?

6 A. Yes.

7 Q. So, he's thanking him for sending the  
8 Superbowl picture. You know what that is; right?

9 A. I believe I've seen it before and this isn't  
10 specifically for the picture that he's thanking, this is  
11 just for materials. We thank every guest that comes on  
12 if they send supplemental materials.

13 MR. BANKSTON: Your Honor, objection  
14 nonresponsive.

15 THE COURT: Sustained.

16 BY MR. BANKSTON:

17 Q. Miss Karpova, I am only asking you --

18 A. Yes.

19 Q. All I am asking you, you have seen the  
20 Superbowl picture?

21 A. You showed it to me before.

22 Q. Right. We've talked about it before,  
23 haven't we?

24 A. Yes.

25 Q. Okay. And you testified to your feelings



1 about it, didn't you.

2 A. I cannot recall specifically what I said.

3 Q. Okay. Go to the top email. Wolfgang  
4 replies for how long he can be on the show: "As long as  
5 you and Alex can put up with me. Wolfgang."

6 Read that correctly?

7 A. Yes.

8 Q. Now, you understood -- well, first let's  
9 start this way, Superbowl 2013 is about one month after  
10 the Sandy Hook shooting. You're aware that a choir of  
11 Sandy Hook school children was sent to that Superbowl to  
12 sing during the halftime performance of that choir?

13 A. Yes.

14 Q. And you understand that Mr. Halbig believed  
15 that that choir of school children who sang at the  
16 Superbowl were actually the children who were claimed to  
17 be murdered at Sandy Hook. You knew that.

18 A. Yes.

19 Q. Okay. And that Superbowl picture, that's  
20 something I want to look at now.

21 MR. BANKSTON: Your Honor, I'm going to  
22 provide the witness Exhibit 43.

23 THE COURT: All right.

24 MR. BANKSTON: Malisa, can you put 43 on  
25 the screen.

1 BY MR. BANKSTON:

2 Q. It says "Ten Sandy Hook Children Found Alive  
3 and Well;" right?

4 A. Yes.

5 MR. BANKSTON: Your Honor, can I approach  
6 the screen?

7 Your Honor, can I approach the screen?

8 THE COURT: Oh, yes. I'm sorry, I  
9 couldn't understand what you said.

10 MR. BANKSTON: Yeah, I know. I'm speaking  
11 quickly. I'm sorry.

12 BY MR. BANKSTON:

13 Q. Do you see this name?

14 A. Yes.

15 Q. Jesse Lewis?

16 A. Yes.

17 Q. You know that's their son, right?

18 A. Yes.

19 Q. Well, Jesse Lewis, the name is their son,  
20 you know that, that's their son's name is what I'm --

21 A. Yes.

22 Q. This is not their son. Right?

23 A. Right.

24 Q. Wolfgang sent this picture to InfoWars  
25 before he went on the show on March 4th, 2015; right?

1 A. Yes.

2 Q. And Nico said, "Got the Superbowl picture.  
3 Thanks for sending." That's what he said; right?

4 A. Yes.

5 Q. Miss Karpova, looking at this picture, it's  
6 true, your personal opinion, as to whether this was  
7 created by a sane, rational human being, you have no  
8 personal opinion about that, do you?

9 A. I have a personal opinion.

10 Q. Okay. Do you remember testifying to me back  
11 in December?

12 A. As a corporate rep.?

13 Q. Uh-huh. Do you remember that?

14 A. I'm not sure what I said.

15 Q. You remember giving a deposition?

16 A. I do.

17 Q. Okay. And were you under oath in that  
18 deposition?

19 A. Yes.

20 Q. Miss Karpova, I want to talk to you about  
21 your deposition. I'm going to bring you this copy so we  
22 can read it together; okay?

23 A. Yes.

24 Q. Okay. And can I move this, is that okay?

25 A. Yes.

1 Q. That way I'm not having to reach over you  
2 and stuff like that.

3 All right. I want you to look here, and  
4 what I am going to read to you, okay, let me find it for  
5 you really quick. 94, 14, and you see it's highlighted  
6 but it's kind of grayed; right?

7 A. Yes.

8 Q. And I'll ask you this question and answer.  
9 All right?

10 "Miss Karpova, will you admit, sitting  
11 here right now, this was not created by a rational, sane  
12 human being, or are you going to tell this jury that  
13 this is created by a rational, sane human being?"

14 Can you tell me what your answer under  
15 oath was?

16 A. My answer under oath was, "I don't have an  
17 opinion, a personal opinion on it."

18 But since I have developed an opinion  
19 that's my truthful answer right now.

20 Q. Okay. So, back six months or so ago, when  
21 you were being deposed and you were shown this picture,  
22 you didn't have a personal opinion on it at all, but in  
23 the intervening time before you've come to this witness  
24 stand in this court and this trial, now you have a  
25 personal opinion?

1 A. Correct.

2 Q. Okay. Tell me now, Miss Karpova, was that  
3 created by a sane, rational human being, in your  
4 opinion?

5 A. May I ask you a question?

6 Q. No, you may not.

7 A. So, I will answer your question, it's just  
8 this particular screen shot is -- are we referring to  
9 Wolfgang Halbig here?

10 A. Yes.

11 Q. So, this, I don't believe this is a -- he  
12 sent this picture but he didn't make this picture. I'm  
13 not sure who made this picture, which is why I can't  
14 comment.

15 MR. BANKSTON: Miss Karpova --

16 THE COURT: Listen to the question.

17 Ask it again.

18 BY MR. BANKSTON:

19 Q. The truth is, you don't know that Wolfgang  
20 Halbig didn't make that photo. You don't have that  
21 knowledge.

22 A. I don't, no.

23 Q. Okay. So, I would please appreciate it if  
24 you didn't testify about things you don't know. Okay?

25 A. Yes.

1           Q.    I don't want you telling this jury that  
2   Wolfgang Halbig didn't make this photo if you don't know  
3   that.   Okay.

4                   Was this photo made by a sane, rational  
5   human being?   Do you have an opinion on it?

6           A.    Yes.

7           Q.    What is your opinion now?

8           A.    I think this photo was made by a person who  
9   is deeply disturbed at what happened and that messed  
10   with his mind.   So the answer would be partially no to  
11   your question.

12          Q.    Partially no.   Okay.

13                   Do you -- do you, sitting here today, do  
14   you understand how wrong it was to encourage this man's  
15   delusions like this?   Do you understand that?

16          A.    We did the best at the time, it wasn't  
17   something that was done on purpose.

18          Q.    According to you, if a source sent you this  
19   picture, it would cause you to have a lot of hope  
20   because you wouldn't want to think that the kids are  
21   dead, you would rather they be alive; right?

22          A.    In -- it was my personal preference, yeah, I  
23   would much rather think that the kids actually were  
24   involved in some kind of operation with the government,  
25   that way they would still be alive.

1           Q.     What do you think would be happening to  
2     those kids, if they were actually being used by the  
3     satanic globalists for an occult ritual, where they cart  
4     them out for the Superbowl and put them in our face and  
5     taunt us with the fact that we actually faked that and  
6     here are the real murdered children who are still in the  
7     possession of the satanic globalists? At the end of  
8     their performance when they leave the Superbowl, do you  
9     think they're about to have a good time?

10          A.     I can't agree with any of what you just  
11     said. My only statement is that I would have much  
12     rather think that these children are alive as opposed to  
13     have been shot the way they were.

14          Q.     Okay. Let's move forward a week.  
15     March 10th, 2015. Okay? I want to show you Plaintiffs'  
16     Exhibit 63.

17                 MR. REYNAL: Are you going to lay  
18     foundation or do you want me to object now?

19                 MR. BANKSTON: What's your objection and  
20     tell me I have to lay some foundation. Have you got a  
21     legal objection?

22                 MR. REYNAL: My legal objection is that  
23     this is an email from --

24                 THE COURT: If you're going to object you  
25     can't talk about what it is. You know that.

1 MR. REYNAL: This is not an -- I object,  
2 Your Honor, relevance to an email that wasn't sent to  
3 InfoWars or InfoWars staff.

4 THE COURT: All right. So, you're going  
5 to have to establish something.

6 MR. BANKSTON: Sure. Do the same thing.

7 BY MR. BANKSTON:

8 Q. Miss Karpova, bottom of this email, read the  
9 numbers on the label. Or the letters and numbers.

10 A. The right corner?

11 Q. Right here. Yes, ma'am.

12 A. FSSTX-040027.

13 Q. And you understand that to mean that that  
14 means that this document was in the possession of Free  
15 Speech Systems and that they turned it over to me in  
16 this lawsuit; right?

17 A. It appears so.

18 Q. Okay. So, InfoWars had personal possession  
19 of this email and it was aware what is the content of  
20 this email. You agree?

21 A. It was in the files that's labeled here.

22 MR. BANKSTON: Okay. Your Honor, I move  
23 to admit this email.

24 THE COURT: Any objection?

25 MR. REYNAL: Same objection, your honor,



1 just because it was --

2 THE COURT: Overruled.

3 Petitioner's 63 admitted.

4 *(Plaintiff's Exhibit 63 admitted.)*

5 MR. BANKSTON: Thank you, Your Honor.

6 BY MR. BANKSTON:

7 Q. All right. You have 63 in front of you  
8 right now?

9 A. Yes.

10 Q. Okay. Let's put that up on the screen,  
11 Exhibit 63.

12 That email is from Wolfgang Halbig. And  
13 as I believe we talked about in your deposition, you see  
14 the email that's to, I know you probably don't recognize  
15 that email address, but you see the introduction of it  
16 says "Scarlett," right?

17 A. Yes.

18 Q. And we've come to know that's Scarlett's,  
19 and I'm not going to say her email right now, but that  
20 that is her email address; right?

21 A. Okay. I'll take your word for.

22 Q. So, this is Wolfgang Halbig running to  
23 Scarlett on March 10th, 2015, right?

24 Correct?

25 A. Yes.

1 Q. Okay. So, I'm going to read this for us.  
2 It says:

3 "Scarlett, it is just a matter of time  
4 and all that money you have has to be returned.  
5 How could you even stop to buy your coffee and  
6 you bought coffee for two other people. What  
7 kind of mother does that, especially when you  
8 were on the news tell everyone how you ran  
9 across that fire department parking lot. If  
10 you did, you would have spilled the coffee.

11 "Do some serious soul searching, because  
12 the scam is up. Wolfgang."

13 That's what the email says; right?

14 A. Yes.

15 Q. Do you know if Scarlett Lewis bought coffee  
16 that morning?

17 A. I have no idea what incident he's referring  
18 to, that he means by that.

19 Q. Okay. One thing InfoWars did have in its  
20 possession as early as 2015 is an email establishing  
21 that its guest that it kept promoting to millions was  
22 harassing Scarlett Lewis. That's one thing it had.

23 A. I can't fully agree with that statement.

24 Q. Is the reason you can't agree with that  
25 statement is because you're going to tell this jury and

1 tell them that this email to the mother of a murdered  
2 little boy is not harassment? Is that what you're going  
3 to say?

4 A. I'm going to say that I don't know what  
5 incident he's referring to. I don't know if he had  
6 personal contact with her. I have no idea about any  
7 of -- I can't comment on the contents of an email.

8 Q. Okay. So I understand you don't know  
9 anything about the incident. I didn't know anything  
10 about the incident, either. I'm sure nobody in this  
11 room knew anything about this incident. But I'm sure  
12 that at least some of the people in this room have  
13 formed an opinion one way or another about whether that  
14 is harassing. I want to know yours. Is that harassing  
15 or not?

16 A. I don't have any comment on that.

17 MR. BANKSTON: Okay.

18 THE COURT: All right. We're going to  
19 break for lunch. We're going to break for an hour and a  
20 half.

21 Remember all of my instructions: No  
22 research, no conversation about anything that's happened  
23 in this courtroom. The rule is still in effect for all  
24 the witnesses, and we'll be back at 1:30. Thank you.

25 *(Noon recess.)*

1 WEDNESDAY, JULY 27, 2022 - AFTERNOON SESSION

2 *(The following proceedings were held in open*  
3 *court in the presence of the jury)*

4 THE COURT: Mr. Bankston, when you're  
5 ready.

6 MR. BANKSTON: It's okay if they don't  
7 have counsel in the room?

8 THE COURT: It's 1:34. We are set to the  
9 resume at 1:30.

10 DIRECT EXAMINATION

11 BY MR. BANKSTON:

12 Q. Miss Karpova, before we broke, you were  
13 discussing an email from Wolfgang Halbig harassing  
14 Miss Lewis; correct?

15 A. There was an email from Mr. Halbig to  
16 Scarlett.

17 Q. Okay. I'm -- I want to let -- I'm standing  
18 back here, there's a lot of just some air vent noise, I  
19 know the jurors, too, if I can just ask you again if you  
20 can try to speak up so I can make sure I can hear you.

21 And I believe you said there was an email  
22 from Mr. Halbig to Scarlett.

23 A. Yes, before the break we were discussing the  
24 email from Wolfgang here, the signature, to the  
25 addressee is Scarlett.

1 Q. Okay. And that was an email harassing  
2 Miss Scarlett, saying that she was committing a scam;  
3 right?

4 A. I don't know what Mr. Halbig's intent was  
5 here.

6 Q. Well, regardless of what his intent was, if  
7 you have -- a man is accusing the mother of a murdered  
8 son of engaging in a scam, regardless of whatever he  
9 intended, that's harassing, isn't it?

10 A. I'm sorry, I can't comment on that.

11 MR. BANKSTON: Okay. 64.

12 MR. REYNAL: Subject to my prior  
13 objection.

14 THE COURT: Your running objection, you  
15 mean?

16 MR. REYNAL: Yes, Your Honor.

17 THE COURT: So, your running objection.  
18 It's overruled, then it's agreed. So,  
19 Petitioner's 64 is admitted.

20 *(Plaintiff's Exhibit 64 admitted.)*

21 MR. BANKSTON: Thank you, Your Honor.

22 BY MR. BANKSTON:

23 Q. Miss Karpova, I'm going to show you what's  
24 been marked as Exhibit 64.

25 Malisa would you mind putting that on the

1 screen for me? Thanks.

2 This is an email internal to InfoWars;  
3 correct?

4 A. Yes, it appears so.

5 Q. Yeah, Lee Ann is an InfoWars employee;  
6 right?

7 A. At that time.

8 Q. Lee Ann McAdoo, she did anchor work and  
9 reporting from InfoWars?

10 A. Yes.

11 Q. Louie S., we talked about him earlier;  
12 right?

13 A. Yes.

14 Q. He handles a lot of the website and social  
15 media stuff, he runs that department of InfoWars; right?

16 A. Yes.

17 Q. And on this list, we see that there are a  
18 list of topics; correct?

19 A. Yes.

20 Q. And it says the subject is "Playlist Ideas;"  
21 right?

22 A. Correct.

23 Q. And this is April 16th, 2015. You realize  
24 we were now in the third year after Sandy Hook. You  
25 understand that?

1 A. Yes.

2 Q. Okay. And these topics are, with important  
3 high for playlist ideas, are the following: Vaccines;  
4 police state; InfoWars health; Alex Jones Show; Second  
5 Amendment; rants; celebrity; border; TSA, which I take  
6 is Transportation Safety Administration; geo  
7 engineering; chem trails; GMO; resistance; Boston  
8 bombing; Sandy Hook; victories; winning; good news.  
9 Correct?

10 A. Correct.

11 Q. Okay. So, just on a couple of these that  
12 might not be familiar to the jury, chem trails is the  
13 idea that there are aircraft flying through the country  
14 releasing chemicals into the air that have some sort of  
15 malignant effect on the people of this country.  
16 Correct?

17 A. Not necessarily.

18 Q. Okay. But that's one thing that chem trails  
19 means. That's something Mr. Jones has talked about;  
20 right? How these airplanes are leaving these chem  
21 trails by spraying out these chemicals that leads to  
22 population control and all that sort of stuff?

23 A. I don't remember the specific reference that  
24 you're implying here to the broadcast that he's  
25 mentioned this.

1 Q. Okay.

2 A. But I know that's something that people have  
3 talked about in general as being part of that.

4 Q. Okay. When it says "GMO," that's  
5 genetically modified organisms?

6 A. Yes.

7 Q. And Mr. Jones, when selling his products on  
8 his website, talks about the idea of genetically  
9 modified organisms making us unsafe; right?

10 A. Yes.

11 Q. He sells products that will make you safer;  
12 right?

13 A. I wouldn't say that. I don't agree with  
14 that.

15 Q. Okay. And then another thing we can see is  
16 that it's been almost three years since the Sandy Hook  
17 shooting and InfoWars is still proposing Sandy Hook for  
18 its playlist ideas. That's correct?

19 A. Yes.

20 Q. Okay. You add to your list of videos -- is  
21 that still in front of you?

22 A. Yes, it is.

23 Q. Okay. Can you look at May 29th, 2015. Did  
24 InfoWars publish any videos at that time?

25 A. Yes.



1 Q. How many -- on May 29th, 2015, did InfoWars  
2 publish a video or multiple videos?

3 A. Three videos.

4 Q. Okay. Three videos on that day. And the  
5 first one is titled "Sandy Hook, the Lies Keep Growing."  
6 Right?

7 A. No, I believe that's the middle one.

8 Q. Oh, okay. You may have them in a different  
9 order. Let me give you all three titles, you can tell  
10 me if these are the three titles, how does that sound?

11 A. Yes.

12 Q. You have "Sandy Hook, the Lies Keep  
13 Growing," "School Administrator Exposes Sandy Hook  
14 Stonewall," and "New Sandy Hook Questions Arise From  
15 FOIA Hearing." Is that correct?

16 A. Yes.

17 Q. Okay. And InfoWars asked reporter Dan  
18 Bidondi to go cover Halbig's FOIA hearing; right?

19 A. I'm not sure who asked Dan Bidondi.

20 Q. Okay. But certainly InfoWars doesn't allow  
21 outsiders to tell its reporters and send them on  
22 assignments. If Dan Bidondi is going to Newtown to  
23 record things to be played on InfoWars, somebody at  
24 InfoWars told him to do that, right? That's how that  
25 would happen?

1 A. I wouldn't agree with that, no.

2 Q. Okay. We'll see.

3 Just a couple of days later, June 4th,  
4 2015, there's a video there.

5 A. Yes.

6 Q. And that's "Official Claims DHS Involved in  
7 Sandy Hook;" right?

8 A. Yes.

9 Q. Do you know what official it's talking  
10 about?

11 A. I don't remember, recall right now.

12 Q. Wolfgang though, Wolfgang Halbig? That's  
13 who this video is talking about? Does that refresh your  
14 memory?

15 A. I'll take your word on it.

16 Q. Okay. And on June 4th, 2015, Mr. Bidondi  
17 ended up confronting some Newtown city officials in  
18 Newtown. You're aware of that; right?

19 A. I'm not sure what date it was, but, yes,  
20 I've seen the confrontation.

21 Q. Okay. Let's take a look at that now.

22 Can we play the copy of video 27?

23 THE COURT: Did you say 27?

24 MR. BANKSTON: Yes, Your Honor.

25 *(Video played off the record.)*

1 BY MR. BANKSTON:

2 Q. Now, Miss Karpova, as we have discussed, you  
3 had seen those confrontations before?

4 A. Yes.

5 Q. And we had talked about them, you and I,  
6 before; correct?

7 A. Yes.

8 Q. And I am correct that, after seeing that  
9 video and understanding about Dan Bidondi, that you  
10 believe Dan Bidondi is a good reporter. Right?

11 A. I wouldn't completely agree with that  
12 statement. I think he was doing -- is he a little rough  
13 around the edges and gets in people's faces, yes, and  
14 it's not exactly my style. But he -- I think that he  
15 did what he believed was the right thing to do at that  
16 time.

17 Q. Okay.

18 A. So by that definition of him trying to  
19 pursue the truth in his mind, I think that makes him a  
20 good reporter in that way.

21 Q. Okay. Do you remember giving your  
22 deposition in December 2021 right?

23 A. Yes.

24 Q. Okay. And you were under oath for that  
25 deposition?

1 A. Yes.

2 Q. Okay. I am going to show you from your  
3 deposition, since you told me that you disagreed, I'm  
4 going to show you lines 173, I mean, excuse me,  
5 page 173, 14. Okay. I'm going to see if we can get  
6 this in front of you.

7 And you see these questions; right?

8 A. Yes.

9 Q. This question/answer.

10 And it says, "You, you are testifying  
11 here, right now, Dan Bidondi is a good reporter. Is  
12 that what you're testifying to?"

13 Can you tell us your answer?

14 A. "Insofar as him trying to investigate what  
15 happened to find the truth, that's what a good reporter  
16 is supposed to do."

17 Q. What we just saw on that video, the things  
18 Mr. Bidondi said, that's what a good reporter is  
19 supposed to do?

20 A. That's what I just answered. He believed  
21 what he was doing and he was trying to find the truth,  
22 and my answer is pretty much exactly the same as my  
23 previous testimony.

24 Q. So, today you stand by your answer in  
25 deposition, Mr. Bidondi is a good reporter, that's what

1 good reporters do.

2 A. I just qualified it. A good reporter is  
3 supposed to get out there and find the truth no matter  
4 what.

5 Q. Okay. No matter what.

6 A. It's not my style the way he did it, I  
7 wouldn't advise him to do so, but he's his own person.

8 Q. Well, it's InfoWars' style, right? They  
9 loved this; right?

10 A. I don't know that.

11 Q. In fact, they knew, InfoWars knew, your  
12 colleagues fully knew, that InfoWars -- that Dan Bidondi  
13 was down there in Newtown and he might be frightening  
14 people. They knew that. And liked it. Right?

15 A. I don't agree with that.

16 Q. Okay. Well, let's see. I would like to  
17 look an your list there. Do you see a video from  
18 July 8, 2015?

19 A. Yes.

20 Q. And that video is entitled "The Fight For  
21 Freedom of Information in Sandy Hook." Right?

22 A. Yes.

23 Q. Okay. Let's play clip 31C.

24 *(Video played off the record.)*

25 Did you hear Mr. Dew say about Mr. Bidondi

1 confronting that official, "He seemed to be afraid of  
2 you"?

3 A. I think I recall that, yes.

4 Q. Okay. So, Mr. Dew knew that Mr. Bidondi was  
5 in Newtown and might be frightening people. He knew  
6 that.

7 MR. REYNAL: Object to the speculation,  
8 Your Honor, as to what Rob Dew knew.

9 THE COURT: I think you need to rephrase  
10 your question.

11 MR. BANKSTON: Sure.

12 THE COURT: So, sustained.

13 BY MR. BANKSTON:

14 Q. This video shows in a production video of  
15 the company that at that time the company was airing  
16 information showing that the company knew that Dan  
17 Bidondi might be scaring people.

18 A. This seems to be like his opinion of Rob Dew  
19 just watching the clip from Dan Bidondi. That's what it  
20 is.

21 Q. Sure.

22 So, the nightly news director seems to  
23 have acquired the opinion from this video, as you just  
24 testified, that Mr. Bidondi might be scaring people;  
25 right?

1 A. Whatever that meant to him, yes.

2 Q. Sure.

3 Do you know if, after these  
4 confrontations, do you know if InfoWars asked him to go  
5 back to Sandy Hook?

6 A. I don't know.

7 MR. BANKSTON: 67.

8 MR. REYNAL: Subject to my running  
9 objection nothing further, Your Honor.

10 THE COURT: 67 is admitted.

11 *(Plaintiff's Exhibit 67 admitted.)*

12 MR. BANKSTON: Thank you, Your Honor.

13 Malisa, can we put up 67 on the screen.  
14 And we'll start with the bottom email.

15 BY MR. BANKSTON:

16 Q. Here's a copy of that. So what we've got  
17 here is a message from Dan Bidondi to Rob Dew; right?

18 A. It appears so.

19 Q. And it says, "Hey, Rob, can I do an MOS  
20 tomorrow?"

21 "MOS" is Man on the Street; right?

22 A. Yes.

23 Q. And he said, "I wanted to hit up the Bristol  
24 4th of July parade. It's the country's oldest and  
25 longest-running 4th of July parade celebrations."

1                   So then he starts talking about the  
2                   questions he wants to ask. And he says, "Questions, any  
3                   you want to add or take out, let me know:

4                   "What holiday are we celebrating today?  
5                   What country did we defeat to gain our independence? In  
6                   what year did we declare our independence? What is the  
7                   name of the document that was signed on this date? Can  
8                   you name any of the Founding Fathers that signed the  
9                   Declaration of Independence?"

10                  And then, "According to our constitution,  
11                  who gives us our rights, the government; the military;  
12                  we, the people; or Obama? How many stars are on the  
13                  flag? How many strips?"

14                  Which I believe means stripes.

15                  "Islamic leader Louis Farrakhan recently  
16                  stated that the American flag needs to be put down. Do  
17                  you agree or not? What is your thought -- your  
18                  thoughts -- what is your thought about people burning  
19                  and stomping on the American flag?" And "Do you think  
20                  the Confederate flag should be banned?" And "Do you  
21                  think that banning this flag is an attack on the First  
22                  Amendment?"

23                  Those are what Mr. Bidondi wanted to go  
24                  out and ask people; right?

25                  A.     Suggestions, yes.



1 Q. Sure.

2 Now, let's go up and look at what Mr. Dew  
3 said.

4 He said, "Dan, the MOS will be old by the  
5 time we can air it. Go to Sandy Hook. We will cover  
6 that. Rob." That's what he wrote.

7 A. Correct.

8 Q. Okay. So, if anyone was to say that  
9 Mr. Bidondi stopped working for InfoWars, they stopped  
10 asking him to do stuff because of what he did in  
11 Newtown, that's not true if it was said?

12 A. I'm not sure in what capacity he would be  
13 doing this particular assignment.

14 Q. What do you mean by that, you don't know  
15 what capacity he would be doing it?

16 A. I --

17 Q. Rob Dew is asking an employee of the  
18 company, who is working for InfoWars as its reporter, to  
19 go and cover Sandy Hook, and he's referencing a report  
20 that happened days ago. He knows that he did what he  
21 did days ago, so, when he's asking him to do this, he's  
22 asking him to go do the same thing; right?

23 MR. BANKSTON: Objection. Compound.

24 THE COURT: It was a little bit  
25 complicated.

1 MR. BANKSTON: It is a little clunky. Let  
2 me try again.

3 BY MR. BANKSTON:

4 Q. Because InfoWars knew about what Bidondi had  
5 done days before, it's a reasonable inference that, when  
6 Rob was asking him to go to Sandy Hook again, he was  
7 wanting him to do basically the same thing. Isn't that  
8 fair?

9 MR. REYNAL: Objection. Relevance. Calls  
10 for speculation.

11 THE COURT: Overruled.

12 THE WITNESS: I wouldn't completely agree  
13 with that, no.

14 BY MR. BANKSTON:

15 Q. You don't completely agree with that?

16 A. With your statement, yes.

17 Q. Right.

18 Because what you then, I guess, think is  
19 Mr. Bidondi was going to go to Sandy Hook and do  
20 something totally different than what he had done  
21 before? Is that what you're saying?

22 A. I don't know what he would have done. Rob  
23 Dew has a better idea in this email what he could have  
24 done.

25 Q. Okay. Dan Bidondi's nickname inside of

1 InfoWars is the Kraken; correct?

2 A. I don't think I've heard that before.

3 Q. You've never heard them say, "Release the  
4 Kraken," about Daniel Bidondi?

5 A. No. I know that's a general expression on  
6 the internet about a lot of things, but.

7 Q. What does that mean to you?

8 A. I'm not even sure, to be honest with you.

9 Q. Okay. Dan Bidondi is a former professional  
10 wrestler?

11 A. I'm sorry?

12 Q. Dan Bidondi is a former professional  
13 wrestler?

14 A. I don't know his background. I never seen  
15 or talked to the guy. I haven't really -- but I believe  
16 that's correct.

17 Q. Let's play from that same video. This is  
18 again July 8th, 2015, "The Fight For Freedom of  
19 Information in Sandy Hook." Let's take a look at 31A.

20 *(Video played off the record.)*

21 All right, on the right there, that's  
22 Lee Ann McAdoo right?

23 A. Yes.

24 Q. She's, as we discussed, an InfoWars anchor  
25 and reporter at that time?

1 A. Yes.

2 Q. And on the left there, that's Robert Dew;  
3 right?

4 A. Yes.

5 Q. Again, one of the people we were talking  
6 about as a high-production employee during the course of  
7 his career at InfoWars; right?

8 A. At some point I believe he was.

9 Q. I mean, look, Miss Karpova, I think you can  
10 agree with me, for many, many, many years Rob Dew was  
11 Alex Jones' right-hand man when it came to production.  
12 Do you agree with that?

13 A. He does a lot of things. His official sort  
14 of --

15 Q. Okay. And in that clip Mr. Dew is again  
16 talking about this idea of the Superbowl choir,  
17 something fishy going on with the Superbowl choir.  
18 That's what he's talking about?

19 A. I believe that's what he's talking about.

20 Q. Yeah. And so, even after -- that's after  
21 Wolfgang Halbig had sent Plaintiff's Exhibit 43 and they  
22 had seen this picture, Rob Dew is still on InfoWars  
23 later talking about this Superbowl choir, isn't he?

24 A. Must have had questions about this picture.

25 Q. All right. At this time you're aware,

1 aren't you, that the company knew that Mr. Halbig had  
2 been warned about trespassing on the Catholic private  
3 school at Sandy Hook. You knew that.

4 A. Would you remind me what exactly you're  
5 referring to?

6 Q. I would love to.

7 MR. BANKSTON: 66.

8 MR. REYNAL: I would like to see some  
9 predicate. I can't agree to it that the point, Your  
10 Honor.

11 THE COURT: Okay.

12 BY MR. BANKSTON:

13 Q. All right. I'm going to show you this  
14 document. It's got one of those labels at the bottom  
15 again.

16 A. Yes.

17 Q. Do you want to read it for me?

18 A. FSSTX-042477.

19 Q. This was in the company's possession that  
20 they gave to me?

21 A. It appears so.

22 Q. You knew that's what that label means,  
23 Miss Karpova, we testified about that before, right, the  
24 company give that document to me?

25 A. It appears so.

1 Q. This document was in the company's  
2 possession?

3 A. My answer is the same.

4 Q. The information in this document was in the  
5 company's possession.

6 A. It appears so.

7 Q. If anyone in the company actually cared to  
8 look, they could learn every piece of information in  
9 this document. It was in their possession. Right?

10 A. I don't know whose possession it was in.

11 Q. Yes, you do, Miss Karpova. You've just  
12 testified that that label means it was in InfoWars'  
13 possession and they gave it to me. Right?

14 A. Correct, but the company comprises of people  
15 and I don't know who the people would be.

16 Q. You understand that Free Speech Systems, LLC  
17 is a defendant in this case?

18 A. Yes.

19 Q. A corporation isn't a person, like we know a  
20 person, right, it's a thing. You understand what I  
21 mean?

22 A. Yes, but --

23 Q. And it's a defendant; right?

24 A. Yes, but inanimate object cannot read an  
25 email and and be in possession.

1 Q. That's absolutely true, isn't it?

2 A. Right.

3 Q. A corporation can only act through the  
4 people who are inside of it. And so, if a corporation  
5 has a piece of information in its possession, the only  
6 way that they can act on it is if somebody actually  
7 reads it; right?

8 A. Yes.

9 Q. And this piece of information was in the  
10 possession of Free Speech Systems, LLC. You agree with  
11 that?

12 A. According to this stamp, yes.

13 MR. BANKSTON: Move 63 -- I mean, excuse  
14 me, 66 into evidence.

15 THE COURT: Any objection?

16 MR. REYNAL: Yes, Your Honor. I mean, the  
17 fact that this was in the possession of the company --

18 MR. BANKSTON: Your Honor --

19 THE COURT: What is the legal objection?

20 MR. REYNAL: They haven't established any  
21 predicate other than we produced it in discovery and  
22 it's not our document.

23 MR. BANKSTON: Your Honor, I don't know  
24 what that legal objection is.

25 THE COURT: I don't, either.

1 MR. REYNAL: What's the exception to the  
2 hearsay rule?

3 MR. BANKSTON: It's not offered for the  
4 truth of the matter asserted. It's offered that he had  
5 knowledge that these events happened or that Mr. Halbig  
6 was informed of these events.

7 MR. REYNAL: His question -- I object,  
8 Your Honor.

9 THE COURT: All right. Overruled.

10 Petitioner's 66 is admitted into evidence.  
11 *(Plaintiff's Exhibit 66 admitted.)*

12 MR. BANKSTON: Thank you, Your Honor.

13 Can we put 66 up on the screen?

14 BY MR. BANKSTON:

15 Q. We see up at the top here --

16 Malisa, can you highlight the letterhead  
17 at the very top that says "Diocese"?

18 See how it says "Diocese of Bridgeport"?  
19 Do you know what a diocese is?

20 A. Vaguely.

21 Q. Like a division of the Catholic church.

22 A. Yes, yes.

23 Q. Okay. Let's go down now to who it's  
24 addressed to. We'll go down to the email and the date  
25 and the address. June 25th, 2015, Wolfgang Halbig, down



1 in Sorrento, Florida; correct?

2 A. That's what it says.

3 Q. And that's June 25th. That is now I believe  
4 21 days after the videos that we just saw with Dan  
5 Bidondi and Wolfgang Halbig in Newtown together; right?

6 A. Appears so.

7 Q. Okay. Can we go down to the text of this  
8 letter?

9 "Dear Mr. Halbig. As the Chief Legal  
10 Officer of the Diocese of Bridgeport, I write  
11 to serve you notice that you are to cease and  
12 desist any activity on or in the vicinity of  
13 St. Rose of Lima Parrish, including the church,  
14 rectory, school, and any other ancillary  
15 buildings on or near the Parrish grounds. Your  
16 presence will be considered a trespass and a  
17 nuisance.

18 "Should there be any violation of this  
19 order, the Parrish reserves the right to seek  
20 any and all remedies available to it under the  
21 law and will immediately contact law  
22 enforcement to remove you and any individuals  
23 in your company from the property, forcibly, if  
24 necessary.

25 "This order shall remain in effect from

1 the date of this letter forward.

2 "Very truly yours, Anne O. McCrory, Chief  
3 Legal and Real Estate Officer."

4 I read that correctly?

5 A. Yes.

6 Q. Okay. So, in the possession of Free Speech  
7 Systems, LLC was a document which establishes that  
8 Wolfgang Halbig had been warned about a trespass on this  
9 church's property.

10 A. I don't know where this document came from,  
11 especially to answer truthfully.

12 Q. No, I think you do know where it came from  
13 because we saw at the top. It came from the Diocese of  
14 Bridgeport; right? That's where it came from; right?

15 A. That's what it says.

16 Q. And we know from your testimony this was in  
17 the possession of Free Speech Systems, LLC; correct?

18 A. According to the stamp.

19 Q. Sure.

20 Did you know that Mr. Halbig was alleging  
21 that children at that private school were actually the  
22 crisis actor children of Sandy Hook? Did you know that?

23 A. I don't recall that specifically.

24 Q. Okay. You don't recall Mr. Bidondi talking  
25 about that?

1 A. I don't specifically recall that.

2 Q. You don't recall Mr. Dew talking about that?

3 A. About what?

4 Q. About the fact that Wolfgang Halbig believed  
5 that children enrolled at the St. Rose of Lima Parrish  
6 School were actually crisis actor children used to fake  
7 Sandy Hook. Did you know Mr. Dew ever talked about  
8 that?

9 A. I don't remember the details.

10 Q. Okay. Let's go forward just a little bit,  
11 another week or so. Let's go to July 7th, 2015.

12 Do you have your list in front of you?

13 A. Yes.

14 Q. And Free Speech Systems made a video on that  
15 day related to Sandy Hook; correct?

16 A. Yes.

17 Q. And that video was called "Government is  
18 Manufacturing Crises;" right?

19 A. Yes.

20 Q. Okay. Now, Rob Dew has an uncle that you  
21 know about; right? You know who I'm talking about when  
22 I say Rob Dew's uncle?

23 A. I heard him talk about his uncle in the  
24 videos. I don't know his uncle.

25 Q. Personally, I understand that.

1                   But you know, for instance, that Rob Dew's  
2     uncle, who it's claimed was in the FBI at some point,  
3     that he went to go watch the hearing with Wolfgang  
4     Halbig. Do you know that?

5                   A.     I don't know if he did that. I don't  
6     know -- I can't remember if Rob Dew claimed that.

7                   Q.     Oh, okay.

8                   A.     If he --

9                   Q.     Let me go ahead and show you a clip, maybe  
10    make it easier to talk about.

11                   Let's take look at that video, July 7th,  
12    2015, "Government is Manufacturing Crises." And this is  
13    PVX 16C.

14                   *(Video played off the record.)*

15                   Mr. Jones said "The people who did Sandy  
16    Hook know where your uncle lives." You heard that?

17                   A.     Yes.

18                   Q.     Who are the people who did Sandy Hook?

19                   A.     I have no idea who he was referring to.

20                   Q.     So, you have no idea what Mr. Jones is  
21    talking about in terms of who he is claiming was  
22    responsible for Sandy Hook.

23                   A.     I don't know what he -- what people he's  
24    referring to.

25                   Q.     Don't you think by all of the videos we

1 watched today that talk about government coverup, false  
2 flag, Obama's PSYOP, don't you think you know who he is  
3 talking about?

4 A. I don't -- I don't know. You ask me to not  
5 speculate and I'm telling you what truthfully -- I don't  
6 want to speculate on what people he meant there.

7 Q. Okay. One thing we know Mr. Jones did say  
8 is that, as far as his telling his audience about the  
9 people who did Sandy Hook, he thought it was really  
10 dangerous but he had to tell the truth; right? He's  
11 telling his audience the truth; do you agree?

12 A. As best he believed, yes.

13 Q. Because again, Mr. Jones tells his audience  
14 he is the front line of truth journalism; right?

15 A. Uh-huh. Yes.

16 Q. Okay. You see there's another video  
17 July 7th, 2015; correct?

18 A. Yes.

19 Q. And that video is entitled "Retired FBI  
20 Agent Investigates Sandy Hook: Mega Massive Coverup."  
21 Correct?

22 A. That's what it says.

23 Q. That is also talking about Rob Dew's uncle.

24 A. Okay.

25 Q. I'm not -- I'm asking you to tell us, is

1 that talking about Rob Dew's uncle?

2 A. You would have to refresh my memory.

3 Q. Okay. You know that one of the things you  
4 were supposed to prepare on is the sources for these  
5 videos; right?

6 A. I understand that.

7 Q. And so, as far as who the sources named in  
8 the title of this video, that's not something you can  
9 testify about today?

10 MR. REYNAL: She's not here as a --

11 THE COURT: You know what, let's approach  
12 on this.

13 MR. BANKSTON: Okay.

14 *(Whereupon a discussion was held at the*  
15 *bench off the record.)*

16 BY MR. BANKSTON:

17 Q. Okay, Miss Karpova, let's revisit this. In  
18 fact, let's make sure it's really clear with you --

19 MR. REYNAL: Based on our conversation,  
20 may I have a running objection?

21 THE COURT: Yes, and we'll put it on the  
22 record at the next break.

23 BY MR. BANKSTON:

24 Q. Miss Karpova, you remember earlier we looked  
25 at your notice that set forth the topics that you were

1 supposed to be prepared to testify about as a corporate  
2 representative. You remember that?

3 A. Yes.

4 Q. Okay. I -- actually I think it would be  
5 helpful for this jury if we go over all of them  
6 together, okay? The things that you're supposed to be  
7 testifying about today.

8 One is the sourcing and research for the  
9 videos described in Plaintiffs' petition. That's one of  
10 the topics. Right?

11 A. Yes.

12 Q. And we know you didn't bring anything today  
13 with you to help you testify about that; right?

14 A. I did not.

15 Q. So, anything has got to be in your mind  
16 today; right?

17 A. Yes.

18 Q. And you are not prepared to talk about the  
19 sourcing of these videos, are you?

20 A. The best I can, I am.

21 Q. Well, let's just be real honest about it,  
22 Miss Karpova, if I want to know the source of some of  
23 these videos, these people I've asked you and you said  
24 no, you're not prepared to tell me the source, are you?

25 A. If the source is Alex Jones' research and

1 his -- his mind, then that's the source.

2 Q. Right. And again --

3 A. I can't give you something that doesn't  
4 exist beyond that.

5 Q. He's right there. I see him, he exists.  
6 I'm looking at him right now. And I remember you told  
7 me it all came out of his mind; right?

8 MR. REYNAL: Objection to the sidebar,  
9 Your Honor. She's testifying, not him.

10 THE COURT: You know what, I think we're  
11 going to take a little break for the jury. I'm going to  
12 ask the jury to go back for maybe 15 minutes, I'm not a  
13 hundred percent sure how long this will take.

14 Remember my instructions, no conversation  
15 while this is going on. We're going to clear this up  
16 and then hopefully I can explain to you what's going on  
17 after you come back.

18 Miss Karpova, you can step down.

19 *(Whereupon the jurors exit the courtroom*  
20 *and the following proceedings were held in open court:)*

21 THE COURT: All right. So, we've had a  
22 number of objections that Miss Karpova is not here as a  
23 corporate representative. Miss Karpova was designated  
24 as a corporate representative for Free Speech Systems  
25 back last year. I don't remember the exact date. I



1 issued an order of all the things she was supposed to be  
2 prepared to testify about at that deposition.

3           You have objected that she is not a  
4 corporate rep. in a deposition today. I have researched  
5 and can not find any authority for the contention that,  
6 once designated as a corporate rep. in a deposition,  
7 that when you get to trial they are no longer a  
8 corporate rep. So, you can make your argument about  
9 that, but I think she is the corporate rep. today for  
10 the topics she was the corporate rep. for by your  
11 client's designation. She is also an individual who can  
12 testify to her individual knowledge, and she's an  
13 employee of the company.

14           So, I think we're going to have to clear  
15 up for the jury that she does, in fact, speak for Free  
16 Speech Systems according to that list of designated  
17 topics.

18           MR. REYNAL: Your Honor, our position is  
19 that, if the plaintiffs would like to use her as a  
20 corporate rep., they have a full deposition to do so.  
21 She was designated as the corporate rep. for the  
22 deposition. The deposition is evidence in this case,  
23 it's not hearsay, the questions and the answers are  
24 there.

25           When I was asked to present her here, I

1 was not told that she was being brought as a corporate  
2 representative, I was not given any notice that she  
3 would be examined as a corporate representative, I  
4 wasn't told the topics about it. And she wasn't told.  
5 And I think it would give the jury the wrong impression  
6 to say that she somehow knew that she needed to be  
7 prepared on these topics today.

8 She didn't work at the company during any  
9 of the period that he's talking about; she started there  
10 almost in 2016. So, she went through, and I'm not going  
11 relitigate the breadth of the topics that were  
12 designated, but they're extremely broad. She did her  
13 best to be prepared then, which was almost a year ago.  
14 Now, you know, a year later, to expect her to remember,  
15 especially since she wasn't asked to, I think it would  
16 leave the wrong impression in the jury's mind.

17 THE COURT: Mr. Bankston.

18 MR. BANKSTON: Your Honor, the only  
19 mechanism by which to have a corporate representative  
20 prepare and to place them under that duty is a proper  
21 deposition notice under Rule 199. There is no mechanism  
22 under Texas law for me to create new topics or change  
23 anything around or make anything different, or there's  
24 nothing requiring me to serve on a corporate  
25 representative at trial any sort of new notice or notice

1 that they need to be prepared.

2 The only thing that I ever need to do is  
3 have that person create the corporate representative  
4 notice and they choose for those topics. Now, that  
5 person is now a corporate representative and has that  
6 knowledge. So it's our position on that.

7 I can tell you, though, hopefully, if it  
8 helps this out, I don't plan to ask her a lot more about  
9 corporate representative stuff. I plan to go now into  
10 personal stuff. But as far as what we've already got,  
11 she was clearly noticed the correct way. And if  
12 Mr. Reynal wants to point me to how I would have -- what  
13 Rule of Civil Procedure I would have invoked to have  
14 her, right, to give her that notice again, or that I'm  
15 required to give it to her again, I would certainly look  
16 at that authority; but I don't know it, either.

17 THE COURT: I also specifically remember,  
18 and I don't know if you were the attorney at the time,  
19 but you're bound by what your predecessors did, saying  
20 that Free Speech Systems would be free to designate as  
21 many individuals as it believed necessary to comply with  
22 the order of topics. Right? Does that make sense?

23 MR. REYNAL: Absolutely.

24 THE COURT: So, the fact that your client  
25 chose an individual who didn't work there during the

1 pertinent timeframe was your client's choice. So that  
2 argument fails. She was -- she was designated by Free  
3 Speech Systems; she speaks for Free Speech Systems on  
4 those topics today.

5 I -- I think if you -- I don't want to  
6 confuse the jury in either direction. I think what I  
7 need to tell them is she was designated as the corporate  
8 representative for Free Speech Systems for her  
9 deposition, what date was it? Was it in December?

10 MR. REYNAL: December 3rd, 2021.

11 THE COURT: In December 2021. To the  
12 extent she is asked questions about those topics today,  
13 she is still the corporate rep., but she also is  
14 testifying about other things as a corporate employee or  
15 as an individual.

16 MR. BANKSTON: That's fine, Your Honor.

17 THE COURT: Do you have an alternative  
18 suggestion?

19 MR. REYNAL: I think that the entire line  
20 of questioning was inappropriate. Your Honor has  
21 repeatedly sanctioned Free Speech Systems for not having  
22 a prepared corporate rep. It appears that this is yet  
23 another sanction piled on top of the earlier ones by  
24 making --

25 THE COURT: It is not.

1 MR. REYNAL: -- making Free Speech Systems  
2 look unprepared at trial.

3 THE COURT: Nobody can do that but Free  
4 Speech Systems. That's their choice.

5 MR. BANKSTON: Your Honor, the other thing  
6 I just wanted to say, not for you but for the appellate  
7 record, is that Plaintiffs find it profoundly unjust for  
8 Defendants to say we should not be able to have  
9 questioned their corporate representative designated at  
10 trial when -- and, instead, use a deposition that was  
11 ruled by this Court to be a nonappearance. And so we  
12 think for an additional reason --

13 THE COURT: Well, I also think depositions  
14 are disfavored when the witness is available to testify  
15 in person in Texas. We all know that. Because the jury  
16 needs to see and hear the witness right in front of them  
17 and the back and forth. So, that argument also is not  
18 compelling to me.

19 MR. REYNAL: I would ask that Mr. Bankston  
20 agree that when he emailed me to make Miss Karpova  
21 available he did not say he wanted her here as a  
22 corporate representative.

23 MR. BANKSTON: I don't, yeah, I don't see  
24 where that requirement is. I mean, he's the one who  
25 made her a corporate representative, I don't think --

1 I'm not sure why --

2 THE COURT: I mean, here is the thing, I  
3 don't think this is usually a fight because I don't  
4 think people usually object to a corporate  
5 representative testifying in that role, because they've  
6 chosen them and they've prepared them and they want them  
7 to represent their corporation. So, this is, yet,  
8 another unique situation here.

9 So, there's -- I couldn't find any caselaw  
10 in Texas on this issue, and it was bothering me because  
11 I felt like we were giving the wrong impression. So no,  
12 sure, he didn't do that, because this has never happened  
13 before as far as I'm aware. So, I am going to tell the  
14 jury very briefly, to the extent she's testifying about  
15 the issues that she was designated by Free Speech  
16 Systems to be the person to represent them, that's what  
17 she's doing here today, as well.

18 And Mr. Bankston and yourself, Mr. Reynal,  
19 when you examine her, make sure you make it clear that  
20 that's the capacity, if it is, or if it's her capacity  
21 as a producer or person, whatever it is. All right?  
22 That's what we're going to do.

23 MR. BANKSTON: Absolutely.

24 THE COURT: Okay. We were ready to bring  
25 the jury back.

1                   *(The following proceedings were held in*  
2                   *open court in the presence of the jury.)*

3                   THE COURT: All right. So, for my jury,  
4                   just to try to keep things clear and not confused,  
5                   Ms. Karpova was designated by Free Speech Systems to be  
6                   their corporate representative at a deposition. For  
7                   that -- in that process, she is -- Free Speech Systems  
8                   and Miss Karpova are given, in advance, the list of  
9                   topics that will be covered at that deposition, because  
10                  she is actually required to be prepared to speak on them  
11                  on behalf of the corporation.

12                  For the purposes of this trial, if the  
13                  question is in that role as the corporate  
14                  representative, she can answer on behalf of Free Speech  
15                  Systems. She may also be asked questions as an  
16                  individual or an employee and a producer, and those have  
17                  similar and different implications for Free Speech  
18                  Systems.

19                  So, that probably is confusing but  
20                  hopefully helps a little bit. And now we're going to  
21                  keep going.

22                  MR. BANKSTON: Thank you, Your Honor.

23                  BY MR. BANKSTON:

24                  Q. We're going to come talk about these topics  
25                  again. All right. And I have these topics in front of

1 you. And the first topic we had talked about was the  
2 sourcing and research for the videos in Plaintiffs'  
3 petition; correct?

4 A. Yes.

5 Q. And as you told me, most of the sourcing and  
6 research from that came out of Alex Jones' mind. Right?

7 A. If Alex Jones is on the video, yes.

8 Q. Yes. Okay.

9 And in preparing, when you were ordered to  
10 get prepared for this a year ago, before this trial, the  
11 company knew what information was going to be important,  
12 what needed to be prepared on. When you were doing  
13 that, you didn't even talk to Alex Jones.

14 A. No.

15 Q. And according to you, he was pretty much the  
16 sole source of information. Right?

17 A. Yeah, it would be impossible to determine  
18 the particular source --

19 THE COURT: I'm sorry, Miss Karpova, I  
20 can't hear you. Your voice is very quiet.

21 THE WITNESS: It would be impossible to  
22 determine particular sources involved in the videos,  
23 because if it was an article, it's probably destroyed,  
24 other video, it's just very difficult to find sources.

25 ///



1 BY MR. BANKSTON:

2 Q. Miss Karpova, you're testifying to this jury  
3 that, without even talking to Alex Jones to try to find  
4 the source, well, the article was probably destroyed.  
5 You don't know, do you?

6 A. I know how the show is run.

7 Q. Right. But you didn't talk to Alex Jones,  
8 and it's in his mind; right?

9 A. That's what it would have to be.

10 Q. Yeah.

11 Let's look at topic number two. It says,  
12 individuals involved in the production of the videos  
13 described in Plaintiffs' petition; right?

14 A. Yes.

15 Q. That's another thing that, if we talk about  
16 today, you're speaking with the voice of the  
17 corporation. Right?

18 A. Yes.

19 Q. And you're supposed to get ready for under  
20 this deposition notice; right?

21 Correct?

22 A. And the -- based on knowing how the show is  
23 run, it would be very difficult to determine the  
24 individuals involved in particular videos.

25 MR. BANKSTON: Your Honor, objection.

1 Nonresponsive.

2 THE COURT: Sustained.

3 BY MR. BANKSTON:

4 Q. Miss Karpova, again I really need you to  
5 answer the question that I'm asking, which is you were  
6 asked to be prepared on the individuals involved in the  
7 production of the videos in Plaintiffs' petition. You  
8 were asked to do that.

9 A. Yes.

10 Q. Okay. And any testimony that you talk about  
11 about today when you do that, you're speaking with the  
12 voice of the corporation; right?

13 A. Yes.

14 Q. Okay. Now, topic number three is the  
15 internal editorial discussions regarding Sandy Hook --  
16 or regarding InfoWars' covering of the Sandy Hook  
17 Elementary School shooting; correct?

18 A. Correct.

19 Q. That's another topic which, if you're  
20 talking about it, you're speaking with the voice of the  
21 corporation; aren't you.

22 A. Correct.

23 Q. The next topic is the documents produced by  
24 the company in response to Plaintiffs' discovery  
25 request. That's another topic?

1 A. Yes.

2 Q. Another topic would be efforts made by the  
3 company to preserve potential evidence; right?

4 A. Yes.

5 Q. Another would be the company's knowledge of  
6 the plaintiffs.

7 A. Yes.

8 Q. Another would be the audience reach of the  
9 videos described in Plaintiffs' petition.

10 A. Yes.

11 Q. All right. For any of those topics you're  
12 going to be speaking with the corporation's voice today.  
13 That's correct?

14 A. Correct.

15 MR. BANKSTON: Okay.

16 71.

17 Mr. Reynal, I'm sorry, 71.

18 THE COURT: 71 is already admitted.

19 MR. BANKSTON: Oh, I'm sorry, Your Honor,  
20 I didn't have that on my list. Thank you very much.

21 BY MR. BANKSTON:

22 Q. Miss Karpova, I am going to hand you  
23 Plaintiffs' Exhibit 71.

24 Can we put 71 up on the screen. Perfect.

25 Now, let's get the bottom email up.

1                   And it's from Louie again, and this time  
2                   to Travis Knight, Rob Dew, and Darrin. Those are all  
3                   InfoWars production staff; right?

4                   A.     Not all.

5                   Q.     Okay. So, Rob Dew is; right?

6                   A.     He is not really involved in the show  
7                   production, no.

8                   Q.     At the date of this email he's the nightly  
9                   news director, isn't he?

10                  A.     Perhaps.

11                  Q.     Okay. So, he's nightly news director,  
12                  right?

13                         And then Darrin, he's involved in  
14                  production. Darrin McBreen?

15                  A.     I'm not sure his involvement at that time.

16                  Q.     He's also been on-air talent, hasn't he?  
17                  He's been like an on-air anchor, too?

18                  A.     He has.

19                  Q.     Okay. And then Travis Knight, that's  
20                  somebody involved in production; right?

21                  A.     To my recollection, Travis Knight was not  
22                  very involved in production.

23                  Q.     Okay. Did you prepare to find that out?

24                  A.     Yes.

25                  Q.     Do anything to find that out?

1 A. To my recollection, yes.

2 Q. Okay. Now, he says here -- Louie says to  
3 these gentlemen, "Video files for Facebook upload." I'm  
4 taking "FB" means Facebook upload? Would you agree with  
5 that?

6 A. Yes.

7 Q. Because in the next line of the email it  
8 says, "can I get these video files for future strategic  
9 Facebook uploads?"; right?

10 A. Yes.

11 Q. So, this involves the company's social media  
12 strategy; right?

13 *(Interruption in proceedings.)*

14 THE COURT: Just a reminder, got to turn  
15 off your phone before you come in the courtroom.

16 BY MR. BANKSTON:

17 Q. All right. Let me ask you that one more  
18 time. This email relates to the company's social media  
19 strategy.

20 A. I'm not sure exactly what Louis' meaning of  
21 here.

22 Q. Well, we know what Facebook is; right?

23 A. Yes.

24 Q. That's social media. Right?

25 A. Yes.

1 Q. And then he asked about strategic uploads.  
2 Right?

3 A. Correct.

4 Q. That's not a big stretch to say he's talking  
5 about social media strategy, is it, Miss Karpova.

6 A. I'm not sure what he's talking about, what  
7 he's referring to. They have specific lingo between  
8 them. I don't know.

9 Q. Sure.

10 All right, let's look at some of the  
11 things that he's asking that we can get the videos up  
12 for. One is about "The Father of Weaponized Weather,"  
13 you see that. Right?

14 A. Yes.

15 Q. One is "How to Survive a Mass Shooting;"  
16 correct?

17 A. Yes.

18 Q. One is "Ancient Health Secrets Big Pharma  
19 Fears;" right?

20 A. Yes.

21 Q. All right. Let's scroll down.

22 "Charlie Sheen's video message to  
23 President Obama." Correct?

24 A. Yes.

25 Q. "Drones Shot Down Over Texas;" correct?

1 A. Yes.

2 Q. "Food: The Ultimate Secret Exposed, Part 1  
3 of 2."

4 A. Correct.

5 Q. "Immortal Technique on Fire With Alex  
6 Jones."

7 A. Correct.

8 Q. And the "Why People Think Sandy Hook is a  
9 Hoax."

10 A. Correct.

11 Q. That video down at the end, the Sandy Hook  
12 why people think it's a hoax, as you remember that was a  
13 video we talked about from 2013, wasn't it.

14 A. I do believe this was on the list. Yes.

15 Q. From 2013.

16 So, here we are, a couple of years later,  
17 and InfoWars is using that video as part of its  
18 strategic Facebook uploads; right?

19 A. Whatever that means, yes.

20 Q. Well, one of the things that you were  
21 supposed to be prepared on was, A, the company's  
22 documents that were produced in response to the  
23 discovery request; and, B, the company's editorial  
24 discussions about Sandy Hook. This falls under both of  
25 that, doesn't it.

1           A.    I'm not sure if this email falls under  
2 those.

3           Q.    This is an editorial discussion, isn't it?  
4 Talking about Facebook upload strategies. Right?

5           A.    I wouldn't call that editorial conversation.

6           Q.    But one thing we know, it's certainly a  
7 document produced by the defendants in discovery.

8           A.    It appears so. The stamp, yes.

9           Q.    Okay. You can take that town.  
10                    You know Jim Fetzer. Do you know who that  
11 is?

12          A.    I know of him.

13          Q.    Familiar, yeah. Not know him personally,  
14 you know who I'm talking about when I say Jim Fetzer.

15          A.    Yes.

16          Q.    Okay. Now, Jim Fetzer, as you will agree  
17 with me, I believe, is a former professor at a  
18 university.

19          A.    Yes.

20          Q.    And after he stopped being a professor,  
21 Mr. Fetzer started getting into very obscure, strange  
22 conspiracy theories. You would agree with that?

23          A.    I do think he was heavy into conspiracies,  
24 yes.

25          Q.    Really weird ones, too; right? Do you know



1 about any of his strange conspiracies?

2 A. I haven't followed Jim Fetzer at all, pretty  
3 much at all.

4 Q. Okay. Well, I want to, let's -- you know  
5 about Jim Fetzer's PDF book he made that he released?  
6 Do you know what I'm talking about?

7 A. The famous book you're talking about?

8 Q. I don't know why you would think it was  
9 famous. Do you have a reason to think it's famous?

10 A. Well, infamous?

11 Q. I think that might be. I'll go with you  
12 there. But are you telling me right now you have a  
13 reason to think that there's a reason that this book is  
14 bad if it's infamous? Is that what you're telling me?

15 A. I'm not sure, the question again?

16 Q. Sure. Usually when I describe somebody as  
17 infamous, I'm not paying them a compliment. Do you  
18 understand what I mean?

19 A. Yes.

20 Q. So, when you're describing Mr. Fetzer's book  
21 as infamous, you are not paying it a compliment?

22 A. Well, this book is a subject -- it came up a  
23 lot during the course of this lawsuit, which is why I'm  
24 describing it that way.

25 Q. Got you. Okay.

1 72.

2 THE COURT: 72 is also already admitted.

3 MR. BANKSTON: Oh, I don't know why I  
4 don't have that one down here.

5 BY MR. BANKSTON:

6 Q. I'm going to show you Plaintiffs'  
7 Exhibit 72.

8 Can we bring up the bottom email. On 72.

9 All right. In this document there's a  
10 gentleman named Allan Powell writing. Do you know who  
11 he is?

12 A. I do not know who he is.

13 Q. It says:

14 "Rob, Jim Fetzer put together a book on  
15 Sandy Hook to which I contributed two chapters.  
16 Amazon have decided they won't handle it. I  
17 think Jim would agree to it being distributed  
18 by InfoWars free as a PDF. We were both just  
19 on the Jeff Rense show today, and Jim gave that  
20 right of distribution to Jeff.

21 "Would you see if Alex would have Jim and  
22 Jim Tracy on to promote the book and talk about  
23 the still running sore of Sandy Hook? I spoke  
24 to Jim Fetzer about this today and said I would  
25 speak to you."

1 I read that correctly?

2 A. Yes.

3 Q. You see that Jeff Rense is mentioned in this  
4 email; correct?

5 A. Yes.

6 Q. This is somebody also InfoWars understood  
7 was not a reliable person. You would agree with that?

8 A. I'm not sure the status of reliability of  
9 Jeff Rense.

10 Q. Okay. We'll come back to that.

11 Same question for Jim Fetzer. The company  
12 understood that Jim Fetzer was not a reliable source of  
13 information. You agree with that?

14 A. At that time I'm not sure if Rob realized it  
15 or not.

16 Q. Okay. Let's go up to the next email.

17 Now, here is an email from Jim Fetzer,  
18 Mr. Rob Dew, and James Tracy, and it says subject is  
19 "Banned Sandy Hook Book;" right?

20 A. Yes.

21 Q. Okay. And it says:

22 "Rob, we are making the book available to  
23 the public for free. Here's the cover and the PDF.  
24 Several sites are now offering it. I would be glad if  
25 Alex were to do the same. I am sure James would be glad

1 to come on with me, if Alex wanted to interview us about  
2 this stunning event. I think the latest case was the  
3 pentagon papers."

4 Read that correctly?

5 A. Yes.

6 Q. Okay. Let's go up to the top. Top email.

7 And Rob writes to James and says, "Thanks  
8 for the heads up. Sent the links to Adan and he is  
9 writing an article about it. Let us know if there is a  
10 bump in downloads."

11 Correct?

12 A. Yes.

13 Q. Okay. Adan Salazar is a writer at InfoWars?

14 A. Yes.

15 Q. Okay. And so we can see from this email in  
16 2015 that InfoWars was helping promote Jim Fetzer's  
17 notorious book; correct?

18 A. I think, based on the fact that it was  
19 banned and they were very asking a lot to help with the  
20 book, I think that's what Rob Dew did here.

21 Q. So, yeah, helped him promote his book,  
22 right? That's what InfoWars did?

23 A. Yes.

24 Q. Okay. I would like to move forward one  
25 month. And I'm going to put in front of you a document

1 which has been admitted as Plaintiffs' Exhibit 73.

2 You remember this email, correct?

3 A. Give me one second.

4 Q. Sure.

5 A. Yes.

6 Q. You remember discussing this email?

7 A. Yes.

8 Q. All right. At the bottom we see that same  
9 Bate stamp; correct?

10 A. Yes.

11 Q. What we call the stamping on the bottom.

12 So, we know this came from InfoWars, we see that it came  
13 from an InfoWars editor, it was to other InfoWars  
14 employees, and we see that there's a discussion about  
15 some of the things we're talking about today; right?

16 A. Yes.

17 MR. BANKSTON: Your Honor, I believe this  
18 is just admitted for opening. If it is, I would like to  
19 put it into evidence.

20 THE COURT: Any objection?

21 MR. REYNAL: Subject to my running  
22 objection under 41.

23 THE COURT: All right. 73 is admitted.

24 *(Plaintiff's Exhibit 73 admitted.)*

25 MR. BANKSTON: Okay. Let's put 73 up on

1 the screen.

2 BY MR. BANKSTON:

3 Q. This says from Paul Joseph Watson. He is  
4 the editor at large of the company at this point;  
5 correct?

6 A. I believe so.

7 Q. Okay. It is to Buckley at InfoWars.com;  
8 right?

9 A. Yes.

10 Q. Now, he is a managerial-level employee at  
11 this time.

12 A. In some capacity, I believe.

13 Q. And he has supervisory role over other  
14 employees?

15 A. I'm not sure as to his exact duties.

16 Q. Okay. One thing we did know about him, it's  
17 Alex Jones' cousin; right?

18 A. Yes.

19 Q. Anthony, that's Anthony Gucciardi?

20 A. I believe so.

21 Q. Okay. And he was an employee at InfoWars?

22 A. I'm sorry, I'm not sure.

23 Q. Okay. Do you know if he was a business  
24 partner of Mr. Jones?

25 A. I don't know for sure, no.

1 Q. Okay. Paul says on December 17th, 2015,  
2 "Sent this to Alex." And he says:

3 "This Sandy Hook stuff is killing us.  
4 It's promoted by the most batshit crazy people, like  
5 Rense and Fetzer, who all hate us anyway. Plus it makes  
6 us look really bad to align with people who harass the  
7 parents of dead kids. It's going to hurt us with Drudge  
8 and bringing bigger names into the show. Plus, the  
9 event happened three years ago. Why even risk our  
10 reputation for it?"

11 That's what Mr. Watson wrote.

12 A. Yes.

13 Q. At the time of this email the company knew  
14 that both Fetzer and Rense would be very questionable  
15 sources of information. You agree with that?

16 A. I think Paul Watson was calling -- was  
17 having that assessment of those people.

18 Q. Let me ask you, as you, as the company, I  
19 want to make this very clear, I'm asking you as the  
20 company, to speak as the company, because you were asked  
21 to prepare on the editorial discussions on Sandy Hook.  
22 It is the company's position that, at the time of this  
23 email, the company knew that Fetzer and Rense would be  
24 very questionable sources of information. You agree  
25 with that?

1 A. Yes, based on Paul Watson's email here.

2 Q. Right.

3 So, in other words, from this point  
4 forward, if anybody relies on Jeff Rense or Jim Fetzer,  
5 they know in the company they were relying on an  
6 unreliable, questionable piece of information. You  
7 would agree with that?

8 A. I wouldn't say that that person would know,  
9 because it would have to be that individual person who  
10 would review -- who would talk to Paul or --

11 Q. Well, I want to make clear, because you said  
12 the company knew, right, the company knew. So, if Free  
13 Speech Systems published things after this date relying  
14 on Jeff Rense and Jim Fetzer, then Free Speech Systems  
15 knew when it published those things that Fetzer and  
16 Rense were very questionable sources of information.  
17 The company knew that.

18 A. Paul watson is an individual, this is his  
19 opinion. His opinion is not getting distributed to  
20 everybody in the company.

21 Q. I don't want to know about Paul's. What I'm  
22 getting from you is you disagree with me, that was not  
23 the company's position.

24 A. I would have to repeat my answer.

25 Q. All right. Well, let's check that out,



1 actually.

2 Do you remember giving your deposition in  
3 2021?

4 A. Yes.

5 Q. And you were under oath at the time?

6 A. Yes.

7 *(Discussion between counsel off the record)*

8 Q. Miss Karpova, I'm going to show you now what  
9 is page 258 of your deposition when you were under oath.  
10 And I want to read these questions and answers to you.  
11 We're going to read this part, okay?

12 A. Uh-huh. Yes.

13 Q. And I'm going to say:

14 "Question: This email where Paul watson  
15 says 'it's promoted by the most batshit crazy people  
16 like Rense and Fetzer,' does the company agree  
17 Mr. Watson's position or does it disagree with  
18 Mr. Watson's position?"

19 What was your first answer?

20 A. "That's Paul's opinion."

21 Q. And then my next question was, "That's  
22 not -- I know that. I know that. Does the company  
23 agree with it or not?"

24 What is the answer?

25 A. "At this time this appears that Fetzer and

1 Rense would be a very questionable source of  
2 information."

3 Q. "Fetzer and Rense would be a very  
4 questionable source of information." That's what you  
5 said in your deposition?

6 A. I stand by that answer at this time.

7 Q. So from this point forward if the company is  
8 relying on Rense and Fetzer, they are relying on a very  
9 questionable source of information. You would with  
10 agree that?

11 A. No, because you were referring to -- you  
12 were asking me as a company representative at the time  
13 of deposition and that -- what I was referring to, at  
14 the time of the deposition those people are considered  
15 by the company as questionable sources, but now  
16 they're --

17 Q. I thought your testimony to me now was that  
18 once the company got this email, once this email was  
19 sent around, now it was in the company's knowledge that  
20 Rense and Fetzer are. But that's not what you're  
21 saying?

22 A. I already told you that this came from Paul  
23 Watson, and in order for the company to know, company  
24 comprised of people, and this email would have to be  
25 distributed to everybody who has editorial --

1 THE COURT: That's not the law. The  
2 company does not need to notify every single employee  
3 for the company to have the knowledge.

4 MR. BANKSTON: Thank you, Your Honor.

5 THE WITNESS: This is how our company  
6 works. And this email was not distributed to every  
7 single person in the company.

8 BY MR. BANKSTON:

9 Q. It sure wasn't. But it was distributed to  
10 one person, wasn't it. Who is that? Who is Alex in  
11 that?

12 A. According to Paul that's what he did. Yes.

13 Q. Sent it to Alex Jones.

14 A. That's what he says he did.

15 Q. And Alex Jones was on notice after this day  
16 of what Mr. Watson was saying; right?

17 A. I'm not sure.

18 Q. Finally we're up to 2016. Okay.

19 And I don't have too much farther to go.

20 2016, do you remember the U.S.  
21 presidential campaign?

22 A. Yes.

23 Q. And you will agree with me that Mr. Jones  
24 became a major issue in that campaign?

25 A. Yes.

1 Q. And, in fact, President -- I mean Secretary  
2 Clinton discussed him in campaign speeches?

3 A. She did.

4 Q. Mr. Jones didn't like that?

5 A. He did not, no.

6 Q. He made a response video about this  
7 controversy in the campaign that he called "Alex Jones'  
8 final statement on Sandy Hook."

9 You're familiar with that video?

10 A. Yes.

11 Q. That was published on your list on  
12 November 18, 2016.

13 A. Yes.

14 Q. Okay. I would like to show some of that  
15 video. So, the first thing we're going to do is I want  
16 to play you PVX 18B.

17 *(Video played off the record.)*

18 Malisa, can you bring up 35 seconds for  
19 me.

20 I think you recall hearing Mr. Jones call  
21 it the smoking gun on the Sandy Hook coverup. Do you  
22 remember him saying that?

23 A. Yes.

24 Q. This is the internet Wayback Machine, a  
25 screen shot from it?

1 A. Yes.

2 Q. And according to Mr. Jones he says that this  
3 shows that the Newtown School District had no traffic;  
4 right?

5 A. That's what he thought at the time that  
6 meant, yes.

7 Q. Right. But he's wrong?

8 A. It appears he's wrong, yes.

9 Q. Why -- in fact, you've testified he's wrong?

10 A. Yes.

11 Q. Do you even know that's the right website?

12 A. Are you referring to the -- which --

13 Q. Newtown.K-12.CS.US/~Sandy Hook.

14 Do you know if that website was in  
15 operation after 2008 or if the school district moved to  
16 a new website?

17 A. No, I don't know.

18 Q. Show me 1:05.

19 That's not Sandy Hook, is it, the school?

20 A. Correct.

21 Q. Okay. So, when Mr. Jones said there were  
22 kids going in and out of the building at Sandy Hook and  
23 that that doesn't make any sense because you would be  
24 getting them away from the building, that's not even the  
25 school. Right?

1           A.     Right.  There was a lot of confusing reports  
2     at that time that reported that to be the school.

3           Q.     Nobody verified it, did they.

4                     Who reported that was the school?

5           A.     I don't -- a lot of people.

6           Q.     You said a lot.  Name one.

7           A.     I don't -- it would be impossible to go back  
8     and figure out who that person was.

9           Q.     You didn't try, did you?

10          A.     Or source.

11          Q.     Were you asked to?

12          A.     We tried, we tried.

13          Q.     What did you do?

14          A.     Just look at -- look at a backup of -- it's  
15     hard to find any videos about Sandy Hook in the first  
16     place now, because they were either deleted or banned or  
17     what.

18          Q.     One thing we can say is that Mr. Jones  
19     falsely told his audience that was the school.

20          A.     He believed that was the school.  That's  
21     what -- he didn't knowingly lie to the public.

22          Q.     I didn't ask you --

23                     In fact, objection.  Nonresponsive.

24                     THE COURT:  Sustained.

25     ///

1 BY MR. BANKSTON:

2 Q. I asked you if Mr. Jones, the statements he  
3 made about that school, that building being Sandy Hook,  
4 were false; right?

5 A. Yes, they were.

6 Q. Okay. Do you remember when he said that  
7 there were porta potties set up for the press?

8 A. Yes.

9 Q. Do you know when porta potties arrived?

10 A. I don't.

11 Q. Okay. And you know, like, some press people  
12 came to the town once the story got out that there was a  
13 mass shooting there; right? Do you understand that?

14 A. Yes, there was just a lot of confusion on  
15 the information media about times and events.

16 Q. A lot of confusion. But -- times and  
17 events. But if you wanted to know, if you wanted to  
18 know when something showed up at Sandy Hook school that  
19 day, one thing you could do was look at the dash cams of  
20 the police officers' cars parked in the parking lot  
21 entrance, and you would see anything that went into the  
22 school. Right?

23 A. I don't know who would have thought to check  
24 that or how they would have come across that  
25 information.

1 Q. Haven't multiple people on InfoWars  
2 discussed the dash cam and how it shows things coming in  
3 and out of Sandy Hook?

4 A. I don't remember specifically the videos  
5 you're referring to.

6 Q. Okay. And you understand that those dash  
7 cam videos are in the report that InfoWars had  
8 possession of since 2013. You understand that.

9 A. I'll take your word for it.

10 Q. Sure. I don't want you to do that.

11 A. Okay.

12 Q. I'll show you.

13 This is Plaintiffs' Exhibit 27. And you  
14 see here we've got lot of media attachments. Do you see  
15 that --

16 A. Yes.

17 Q. -- where it says media attachments?

18 We have outdoor scene processing videos,  
19 don't we.

20 A. Yes.

21 Q. And we even have indoor scene processing  
22 videos; right?

23 A. Yes.

24 Q. And then we have primary scene videos; don't  
25 we?



1 A. Yes.

2 Q. Okay. And this website was known to the  
3 company, as we established earlier; correct?

4 A. This website?

5 Q. The website that contains the official  
6 report of the Sandy Hook crisis released by the state's  
7 attorney's office. We confirmed that InfoWars knew  
8 about this website in those Requests For Admissions. Do  
9 you remember that?

10 A. Actually, I don't remember. Can you remind  
11 me real quick?

12 Q. Sure, I'll come over and point it out again.  
13 Let's go through your stack here, and I'm going to kind  
14 of help you with your papers. We're going to move some  
15 of these exhibits out of your way.

16 It looks like the Request For Admissions  
17 have wandered off the witness stand. Let me get those  
18 for you one second.

19 THE COURT: Well, they're not an exhibit  
20 so you probably wouldn't have left them there.

21 MR. BANKSTON: Yeah, that's what I  
22 figured, exactly. Thank you, Your Honor.

23 Yes, when I say they walked off, yeah, I  
24 mean I walked off with them absentmindedly.

25 ///

1 BY MR. BANKSTON:

2 Q. Here we go. Do you remember this question:  
3 "The report and appendix to the report can be accessed  
4 and downloaded from the following website:"

5 And the company said?

6 A. "Admit."

7 Q. "And you were aware that this report was  
8 publically available on that date."

9 A. "Admit."

10 Q. Okay. Thank you, Miss Karpova.

11 We talked again the men in the woods in  
12 camouflage. Do you remember that?

13 A. Yes.

14 Q. We established in an earlier video, though,  
15 that they knew that was hours after the shooting; right?

16 A. Who knew?

17 Q. Mr. Jones and Mr. Halbig. Remember, they  
18 were talking about the men in the woods and the  
19 helicopter and it was at 12:24 p.m., hours after the  
20 shooting. Mr. Halbig said the school was already safe  
21 and secure by 10:23. Do you remember any of this?

22 A. I think there was just a lot of confusion in  
23 the times and --

24 Q. Didn't get cleared up before this video, did  
25 it.

1           A.     Yeah, I believe there was still a lot of  
2     confusion.

3           Q.     Jones talks about two reporters talking to  
4     each other from the same parking lot? Did you see that  
5     part?

6                     Let's pull it up for you.

7                     Can you pull up two minutes?

8                     Remember this?

9           A.     Yes.

10          Q.     Okay. Do you see the date here?

11          A.     Yes.

12                    MR. BANKSTON: All right. Malisa, is  
13     there any way you can bring up this box.

14                    *(Discussion off the record)*

15                    Won't be very clear but we're going to  
16     give it a try. I hope we're going to be able to see it,  
17     but what I think you can see is P-H-O-E-N-I-X. Phoenix.

18                    Zoom it out again.

19     BY MR. BANKSTON:

20           Q.     Both of these say "Phoenix," don't they.  
21     Right?

22           A.     It appears so.

23           Q.     Okay. And let's go back down again to the  
24     date. May 9th, 2013. That is way after Sandy Hook;  
25     right?

1 A. Sometime after Sandy Hook.

2 Q. Do you know what these women are covering?  
3 Do you know? It's not Sandy Hook, is it.

4 A. Okay.

5 Q. I'm asking, do you know?

6 A. I'm not sure. No.

7 Q. Okay. So this, as far as we know, this has  
8 nothing to do with Sandy Hook; right?

9 A. I don't know. I'm sorry.

10 Q. These women are in a parking lot covering  
11 some event, but it's not Sandy Hook if it's in Phoenix,  
12 is it.

13 A. I don't know.

14 Q. And they don't say they're in different  
15 places, do they. They say they're both in Phoenix;  
16 right?

17 A. Yes. I don't know if Alex saw other video  
18 or he's talking about this video. I'm not sure. And  
19 the article is not -- it's a re-post from Happy Place.  
20 I'm just not sure.

21 Q. Miss Karpova, please.

22 Objection, nonresponsive.

23 THE COURT: Sustain.

24 BY MR. BANKSTON:

25 Q. Miss Karpova, I don't know why I can't get

1 you to answer the questions.

2 A. I'm trying my best.

3 Q. I know, I know, you're trying --

4 MR. REYNAL: Object to the sidebar.

5 THE COURT: Sustained.

6 MR. BANKSTON: Sorry, Your Honor.

7 THE COURT: So, I sustained your objection  
8 to her answer being nonresponsive.

9 That means you didn't answer the question  
10 he asked you. He's going to another question. You're  
11 going to listen to the question he asks you and answer  
12 that question.

13 THE WITNESS: Okay.

14 THE COURT: Not whatever you feel like  
15 saying. Answer the question he asks you.

16 Go ahead.

17 BY MR. BANKSTON:

18 Q. This shows these women are both in Phoenix;  
19 right?

20 A. Yes.

21 Q. Nobody said they were in difference places.  
22 Right?

23 A. I don't know who said they were in different  
24 places, if anybody did say or not.

25 Q. Okay. And now, well, Mr. Jones did.

1 A. Yes.

2 Q. Okay. And you say now that it might be a  
3 different video, this might be the wrong video. Is that  
4 what you're saying?

5 A. I don't want to speculate.

6 Q. Right.

7 And because you were ordered to prepare on  
8 the sourcing and research for the claims like this in  
9 Plaintiffs' petition, that was something you should have  
10 at some point reviewed; right?

11 A. Well, again, this was taken down, so it's  
12 hard, it's impossible to go back to this particular  
13 article and see what was in it.

14 Q. This article isn't on the InfoWars website  
15 right now?

16 A. I don't believe so.

17 Q. This video is certainly in your possession,  
18 isn't it?

19 A. I don't believe so.

20 Q. Miss Karpova, your company gave this video  
21 to me. Do you understand that?

22 A. Okay.

23 Q. So, the video is in your possession. Did  
24 you even look at it?

25 A. I looked at a lot of videos. I don't

1 remember.

2 Q. Okay. Sometimes you've seen out in front of  
3 like parking lots, the courthouse, trailers of CNN  
4 anchors and they're sitting in their little chairs and  
5 their setups and they're being filmed in a parking lot.  
6 You've seen that before?

7 A. Yes.

8 Q. Okay. And these women here are both CNN  
9 anchors. Do you see that down at the bottom?

10 A. Yes.

11 Q. Right. So, I'm just trying to get,  
12 Miss Karpova, what in the heck is suspicious about this?

13 A. I don't know.

14 Q. I don't, either. Okay.

15 Let's play another clip from this video.  
16 Let's play 18C.

17 THE COURT: Is this from the same clip?

18 MR. BANKSTON: Yes. And I'll make that  
19 clear for the record, Your Honor.

20 THE COURT: Well, I'm just trying to  
21 figure out a break time. I want you to finish your, you  
22 know, topic and then --

23 MR. BANKSTON: Let's do -- this is about a  
24 two-minute video. So, let's take a break.

25 THE COURT: Oh, you want to take the break

1 now.

2 Let's take the break now. All right.  
3 It's 2:58. The afternoon break is going to be a little  
4 bit longer because everyone needs it. So, it's 30  
5 minutes. We'll come back a little before 3:30.  
6 Remember all of my instructions, they still apply.

7 Thank you.

8 *(Brief recess.)*

9 THE COURT: And whenever you're ready,  
10 Mr. Bankston.

11 MR. BANKSTON: Thank you, Your Honor.

12 BY MR. BANKSTON:

13 Q. Miss Karpova, before we broke we were  
14 looking at a video that was recorded on November 18,  
15 2016. It was called "Alex Jones' Final Statement on  
16 Sandy Hook." Do you remember that?

17 A. Yes.

18 Q. Okay. I would like to show you now a third  
19 clip from that video. Let's look at clip 18C.

20 *(Video played off the record.)*

21 When Mr. Jones said there, "Let's look  
22 into Sandy Hook," he means his audience, too. They  
23 should look into it, too. That's what he's saying?

24 A. Yes.

25 Q. Miss Karpova, I would like to show you an



1 email from that same day. Okay?

2 I will be talking to her about 77.

3 *(Discussion between counsel off the record.)*

4 THE COURT: 77 is already admitted.

5 MR. BANKSTON: Okay. Just making sure. I  
6 wasn't sure if that was just for opening.

7 BY MR. BANKSTON:

8 Q. I'm going to show you a copy of what's been  
9 marked Plaintiffs' Exhibit 77. All right? And I would  
10 like you, Miss Karpova to start at the second page, the  
11 bottom of this email. Okay.

12 Can we bring up Plaintiffs' Exhibit 77?

13 All right, this is the first email on the  
14 bottom that InfoWars received. And you'll see at the  
15 bottom it says from Lainie Mulvey, Senior Communications  
16 Manager. And I believe if you flip to your front page  
17 you will see that it's addressed to, "Hello, Paul  
18 Joseph."

19 Do you see that?

20 A. Yes.

21 Q. Okay. So, let's read this email. And this  
22 woman here identifies herself with Quantcast. She says,  
23 "InfoWars experienced a surge in traffic around  
24 November 8th."

25 Now, that's not usual, right, because

1 November 8th was election day; right?

2 A. Correct.

3 Q. There's nothing unusual about InfoWars  
4 getting a lot of traffic that day.

5 But it says, "As a normal measure all  
6 large sites experiencing a traffic surge have a hold  
7 automatically placed on rankings for systems review."

8 All right. And it says, "This process  
9 typically takes seven to ten business days. During this  
10 period, the InfoWars profile has remained public at  
11 Quantcast.com/InfoWars. We hope this resolves any  
12 confusion surrounding the temporary hold on your  
13 ranking, which will be restored shortly, hopefully as  
14 soon as tomorrow.

15 "Please know that, as a Quantcast  
16 customer, InfoWars can contact our support team at any  
17 time with questions regarding your measurement  
18 information."

19 Did I read that right?

20 A. Yes.

21 Q. All right. Now, Quantcast is something that  
22 InfoWars is a customer of that will help track rankings  
23 of websites and who is getting traffic; right?

24 A. I'm not sure what they do or how InfoWars  
25 communicates with them, but something along those lines.

1           Q.     Something to do with the traffic for the --  
2     tracking the traffic of the InfoWars website, we're not  
3     exactly sure but something along those lines. Right?

4           A.     Or some kind of hosting, yes.

5           Q.     Okay. I want to go up to the next email  
6     that just says, "Thanks, I'll pass this on."

7                     Can we go up to the next one?

8                     And it's Paul, the editor, writing back to  
9     the woman at Quantcast, saying, "Thanks, I'll pass this  
10    on;" right?

11          A.     Yes.

12          Q.     And then I want to go up. Because  
13    Mr. Watson gets sent an email from the person he passed  
14    it onto named Buckley. And you'll see that right there  
15    it will say -- and, in fact, Malisa, you see where it  
16    says on Friday, 18 November, 2016, if you can zoom it in  
17    there hopefully we can make it be a little better.

18                  Okay. So, here is the first part of  
19    Buckley's email that was written on November 18, 2016,  
20    the same day as the video we were just watching. And it  
21    says, "But no, surely it's a conspiracy theory that they  
22    are trying to suppress our popularity so that the lizard  
23    people can return to the ascension pad at Sandy Hook and  
24    feast on sacrificed crisis actors."

25                  And if you scroll down you see that

1 Buckley has included here a caricature of a man missing  
2 his teeth giving an "okay" symbol.

3 Do you see that?

4 A. Yes.

5 Q. So, Buckley is making a joke here; right?  
6 That's what he's doing.

7 A. It's some kind of meme, and he's making --  
8 and he's saying 'LOL' at the end. And, yes, it's some  
9 kind of an inside joke he's making.

10 Q. An inside joke. Exactly.

11 Because outside, outside InfoWars, on this  
12 very day Mr. Jones is talking about the parents being  
13 actors. And at the same time that's happening we can  
14 tell from this email that his cousin, a managerial  
15 employee, is cracking jokes about the sacrifice of  
16 crisis actors at Sandy Hook. You agree with that?  
17 That's what's happened?

18 A. I don't see how that's related. I don't  
19 know if Buckley is watching the broadcast, I have no  
20 idea what....

21 Q. I don't know, either, but what we do know is  
22 that from inside of InfoWars, at the same time these  
23 events where Mr. Jones is going on telling the public,  
24 that these folks think it's all a big joke. Right?

25 A. I wouldn't say that, no.

1           Q.    I mean, talking about lizard people that  
2    return to the ascension pad to feast on sacrificed  
3    crisis actors, that's sick, isn't it?  It's a bad, bad  
4    joke, isn't it?

5           A.    It's meant to be some kind of grotesque  
6    joke, but it's also -- he's attaching a meme to it.

7           Q.    Are you talking about that picture, the man  
8    there, the meme?  Is what you're saying?

9           A.    A meme.

10          Q.    Yeah, m-e-m-e-m-e?

11          A.    M-e-m-e.

12          Q.    Right.  And yeah, repeated a couple of M-Es  
13    there.

14                    But what a meme is maybe from, you know, I  
15    actually, you know, I've grown up on the internet, that  
16    we have images that we use as jokes on the internet.  
17    Right?

18          A.    Yes.

19          Q.    Okay.  And that's what's happening here;  
20    right?

21                    Right?  That's what's happening here.

22          A.    He's -- what's happening here is he's making  
23    a joke, yes.

24          Q.    Uh-huh.

25                    I would like to move forward just a little

1 bit. 81.

2 MR. REYNAL: Subject to my continuing  
3 objection.

4 THE COURT: The running objection.

5 MR. REYNAL: Yes.

6 THE COURT: The one. Petitioner's 81 is  
7 admitted.

8 *(Plaintiff's Exhibit 81 admitted.)*

9 MR. BANKSTON: Thank you, Your Honor.

10 BY MR. BANKSTON:

11 Q. I'm going to provide you with 81.

12 Malisa, let's bring up 81.

13 Up at the top is a big line of email  
14 addresses, right?

15 A. Yes.

16 Q. Zoom in on that box of email addresses.

17 Now, one of -- it's all from Wolfgang  
18 Halbig; right?

19 A. Yes.

20 Q. Let me walk over to the screen so I can  
21 point some stuff out. NewtownCT.gov, that's somebody  
22 that works in the Newtown government; right?

23 A. Appears so.

24 Q. Okay. You know what the A.P. is, the  
25 Associated Press, AP.org?

1 A. Appears so.

2 Q. FBI.gov?

3 A. Yes.

4 Q. You've got stuff like attorneys, I believe  
5 that's wicker Smith, you've got Newtown government. You  
6 see those?

7 A. Yes.

8 Q. Washington Post. Right?

9 A. Washington Post.

10 Q. Washington Post? Washpost?

11 A. Oh, yes.

12 Q. Right?

13 A. Yes.

14 Q. You've got Brian Ross at ABC?

15 A. Yes.

16 Q. You've got the governor of Connecticut?

17 A. Yes.

18 Q. Criminal division of the US DOJ?

19 A. Yes.

20 Q. Rob Dew at InfoWars?

21 A. Yes.

22 Q. Nico at InfoWars?

23 A. Yes.

24 Q. Some more Orlando Sentinel. That's a  
25 Florida newspaper?

1 A. Appears so.

2 Q. Okay. New York Times?

3 A. Yes.

4 Q. More FBI?

5 A. Correct.

6 Q. Stratfordk. That's some sort of school?

7 A. Something like that.

8 Q. A lot of people copied on this email, right?

9 A. Yes.

10 Q. Let's go down to the email. Let's start  
11 with the first few lines, let's start reading it down.

12 Now, this was sent, as you see on the  
13 document before you, on March 21, 2017. Is that right?

14 A. Yes.

15 Q. Okay. And it says:

16 "Nick and Laura Phelps did a great job of  
17 acting in Newtown, Connecticut, on  
18 December 14th, 2012. I visited their home  
19 today --"

20 And I'm not going to read their address  
21 for this live stream, but he visited it in Windemere,  
22 Florida.

23 "-- thanks to Lieutenant Vangelli telling  
24 me during my wellness check of Nick and Laura  
25 Phelps that they no longer live in Newtown,



1 Connecticut, and they are now Richard and  
2 Jennifer Sexton.

3 "Guess what. He is totally right. And  
4 can you believe it that my Newtown Police  
5 Department guided me in the right direction.

6 "They have a beautiful home with a  
7 three-car garage. They were not home today.  
8 But the good news is that the three adult  
9 female moms with their children standing  
10 outside their homes observed me and wanted to  
11 know what I was doing.

12 "It is spring break for Orange County,  
13 Florida, school children. I showed them this  
14 picture and told them that I did not want to go  
15 to the wrong house to surprise Nick and Laura  
16 from Newtown, Connecticut, aka Richard and  
17 Jennifer Sexton, today.

18 "It took a few minutes for them to look  
19 at the pictures and then they asked why I  
20 wanted to speak to them. They asked for my  
21 name, which I gave them as Wolfgang W. Halbig.  
22 They told me how I knew them and I told them  
23 that they have been on the national news and so  
24 I wanted to meet them again.

25 "Our conversation was all about Newtown,

1 Connecticut. So she said, do you mind if I  
2 text her? I said absolutely not. Waited about  
3 ten minutes only to learn that they did not  
4 know me, which surprised me. They verified the  
5 pictures and why would she text them about  
6 Newtown, Connecticut, and that someone from  
7 there wanted to visit if they were not Nick and  
8 Laura Phelps, now Richard and Jennifer Sexton."

9 Then he says:

10 "At first I did not want to enter, since  
11 it is a gated community, but several people  
12 told me to just go on in. There is no security  
13 guard at the gates. If there is a CCTV they  
14 will see me being told to go in and that is the  
15 only reason or I would not have entered.

16 "Now who says that law enforcement does  
17 not know what they are doing. Thank you,  
18 Newtown Connecticut Police Department."

19 Read that right?

20 A. Yes.

21 Q. Let's flip the page here and look at that  
22 picture he's talking about.

23 Want to bring that up for me, Malisa?

24 Then it says, "Sandy Hook Hoax Actors."  
25 And then you see a YouTube clip of Nick Phelps and his

1 wife; right?

2 A. Yes.

3 Q. Okay. And it says, "Playing the part of  
4 grief-stricken parents." And then we see there's  
5 another picture down there that seems to say that the  
6 two people in the photo below are actually them and that  
7 they're from Florida. Do you see that?

8 A. Yes.

9 Q. Okay. This is the kind of thing that  
10 Mr. Halbig was sending InfoWars that InfoWars had in  
11 it's possession; correct?

12 A. It's the kind of thing that he was sending  
13 and which most of them were not even read. If nobody  
14 responded to this email, I don't think it was read. And  
15 even if it was read, I mean, if I had read it I would  
16 ignore it because it just -- I would consider it  
17 somebody just rambling. Kind of a crazy person. But I  
18 don't think this email was even seen by anybody.

19 MR. BANKSTON: Okay. First, objection.  
20 Nonresponsive.

21 THE COURT: Sustained.

22 BY MR. BANKSTON:

23 Q. Miss Karpova, I asked you, is that email in  
24 the company's possession.

25 A. According to --

1 Q. Can you answer that first?

2 A. Sorry. According to the stamp, yes.

3 Q. Okay. And in that email, which you think  
4 shows a crazy person? Is that what you said?

5 A. If I had read this email, if I had gotten it  
6 at that time and read it, it would appear to me like  
7 that, yes.

8 Q. Yeah, it does, doesn't it. Because that's  
9 Wolfgang Halbig showing up at people's houses. Right?

10 A. I don't know if he's telling the truth here  
11 or what, but it does appear like an unstable person  
12 talking here.

13 Q. Do you remember earlier today I asked you,  
14 do you understand how wrong it was to encourage this  
15 man's delusions like that? Do you still stand by your  
16 answer or after this do you understand how wrong it was?

17 A. I want to say again as my previous answer,  
18 the -- at that time we did not believe that Halbig was  
19 this unstable crazy person, and had we believed it we  
20 would have not put him on the air.

21 Q. Okay. I hear you saying today that when you  
22 read this email it strikes you as crazy. But isn't it  
23 true, Miss Karpova, the truth is that when you were  
24 first shown this email it didn't bother you at all and,  
25 in fact, it struck you as an impassioned man who

1 believes in his heart what he believes and wants to get  
2 to the truth? Isn't that how that email strikes you?

3 A. I mean, it can be read many ways.

4 Q. That's one of -- and no, no, hold on. How  
5 did you read it the first time you saw it. You  
6 believed, it struck you, as an impassioned man who  
7 believed this with all of his heart and wanted to get to  
8 the bottom of it. That's the truth.

9 A. I -- you're telling me that I read this  
10 email before? How -- I don't remember reading it.

11 Q. Okay. Let's refresh your memory on that.  
12 Okay?

13 Do you remember giving your deposition in  
14 2021?

15 A. Yes.

16 Q. And you were under oath.

17 Let me ask you this, Miss Karpova. Before  
18 you came into this courtroom did you read your  
19 deposition?

20 A. Yes.

21 Q. Okay. When did you do that?

22 A. I'm sorry?

23 Q. When did you do that?

24 A. Last night. I mean not that, but before the  
25 first day of deposition.

1                   *(Discussion between counsel off the record.)*

2           Q.     All right. Miss Karpova, we're going to  
3 read some from your deposition again. Okay? And this  
4 is on page 214 of your deposition. And do you see my  
5 question, and then these are the answers. All right?

6           A.     Yes.

7           Q.     I said, "It doesn't creep you out to have  
8 Wolfgang Halbig showing up at these people's houses and  
9 describing their three-car garage and all that stuff,  
10 accusing them of being people they're not? Actually  
11 are? That doesn't -- that doesn't have any -- you don't  
12 have any strong feelings on that one way or another?"

13                   Your answer?

14          A.     "No response."

15          Q.     Says "No response."

16                   And then I said, "Correct?"

17                   What did you say?

18          A.     "Are you asking my personal opinion?"

19          Q.     And I said, "Yeah, your personal opinion."

20                   What did you say, Miss Karpova?

21          A.     "It strikes me as an impassioned man who is  
22 doing an investigation of something he believes in his  
23 own heart and he wants to get to the bottom of."

24                   I stand by that, he was an unstable man  
25 who -- that still stands, that he was impassioned to

1 what he was doing.

2 Q. You know about a month after that,  
3 April 22nd, 2017, InfoWars published a video?

4 A. Which video are you referring to?

5 Q. Let me get you your list in front of you.  
6 Okay?

7 A. I have it, can you just point it out.

8 Q. Okay. April 22nd, 2017.

9 A. Yes.

10 Q. Why don't you tell the jury what the title  
11 of that video was.

12 A. "Sandy Hook Vampires Exposed."

13 Q. Okay. So, one month after we get this --  
14 after Wolfgang Halbig has said that he has visited the  
15 Phelps in Florida, we have this InfoWars episode  
16 entitled "Sandy Hook Vampires Exposed." I would like to  
17 show you a clip that we can talking about from that  
18 video. Okay?

19 A. Yes.

20 Q. Okay. Let's play clip 20B.

21 *(Video played off the record.)*

22 All right. Miss Karpova, vast majority of  
23 what we just heard in there was the same stuff we've  
24 been hearing Mr. Jones and Mr. Halbig talking about over  
25 and over again; right?

1 A. Yes, a lot of that stuff is repeat.

2 Q. In fact, a lot of that stuff comes from  
3 those 16 questions you told me you understood; right?

4 A. I don't have every question memorized but  
5 I'll take your word for that.

6 Q. I didn't ask you that. I asked you, some of  
7 that came from Wolfgang Halbig's questions?

8 A. I would assume so, yes.

9 Q. So, in 2017, well after years of InfoWars  
10 receiving emails from Wolfgang Halbig of the type we've  
11 seen today, they were still repeating the stuff he said  
12 on InfoWars in 2017; correct?

13 A. Could you repeat that again?

14 Q. Sure. Years after InfoWars had possession  
15 of all these emails that we've seen from Wolfgang Halbig  
16 and all of the things that he was doing, they were still  
17 repeating the things he said in 2017.

18 A. Yeah, again.

19 Q. Is that a yes?

20 A. It appears so, yes.

21 Q. Yes. Okay.

22 By the way, we've talked about most of  
23 these false things that are said in there. But have you  
24 ever seen this supposed dash cam footage of these cops  
25 that Mr. Jones is talking about? Or Mr. Dew was talking



1 about?

2 A. I would like to see what you're referring  
3 to.

4 Q. I've never seen it. That's what I'm asking  
5 you.

6 A. Okay.

7 Q. And I'm asking you because I don't think it  
8 exists. Right?

9 A. I don't know.

10 Q. That's made up.

11 A. If they talked about it they must have seen  
12 it.

13 Q. Really. You think they must have seen it?

14 A. They didn't make it up.

15 Q. Well, you're just assuming that, right? You  
16 didn't talk to Rob Dew about this, did you?

17 MR. REYNAL: Objection. Argumentative,  
18 Your Honor.

19 THE COURT: Let's just --

20 MR. BANKSTON: I can rephrase.

21 THE COURT: You can ask the question and  
22 you can ask it that way. Let's just take a beat and  
23 then ask the question again.

24 MR. BANKSTON: Absolutely. Okay.

25 ///

1 BY MR. BANKSTON:

2 Q. Are you testifying here under oath that Rob  
3 Dew has seen this supposed dash cam footage?

4 A. If he had talked about it, he had seen it,  
5 yes.

6 Q. You're positive of that under oath.

7 A. Yes. I've never heard or seen him lie about  
8 you know -- lie on purpose.

9 Q. Why hasn't anybody given it to me if that's  
10 true?

11 A. They probably couldn't find it and it was  
12 downloaded from the internet.

13 Q. Why didn't they put it on the show?

14 A. I don't know.

15 Q. Sounds like Rob Dew was saying, there's this  
16 supposed dash cam footage. I usually don't say  
17 "supposed" about things I've never seen before.  
18 Wouldn't you agree with that?

19 A. I'm not sure what he meant by that.

20 Q. Well, sort of like, if somebody says the  
21 supposed murders of --

22 I'm sorry, do you have an objection?

23 MR. REYNAL: Yeah, this whole thing is  
24 speculative as to what's in Rob Dew's mind, what he's  
25 testifying about.

1 MR. BANKSTON: That's my point.

2 THE COURT: Well, I think that  
3 Miss Karpova is the one who brought this in by saying he  
4 wouldn't say it if he hadn't seen it. He wouldn't lie.  
5 So, now we have to explore how she knows that.

6 BY MR. BANKSTON:

7 Q. Sort of like if somebody was to say the  
8 supposed victims of Sandy Hook, that sort of signals  
9 they're not sure, doesn't it.

10 A. They're not sure about what?

11 Q. Whether there's victims of Sandy Hook.

12 A. Yeah, "supposed" can mean several things,  
13 yes.

14 Q. One of those things can mean Rob Dew has  
15 never seen that dash cam footage; he thought it was  
16 supposed dash cam footage; right?

17 A. I don't know if he read about -- again, I  
18 don't know what he means by that here. I'm just  
19 assuming based on my experience with Rob Dew.

20 Q. You don't know that; right?

21 A. I don't know for sure.

22 Q. Thank you, Miss Karpova.

23 Around this time in the summer of '17 you  
24 understand that Mr. Jones gave an interview to Megyn  
25 Kelly; right?

1 A. Yes.

2 Q. And you understand around this time that a  
3 controversy had developed that Ms. Kelly was covering  
4 about Mr. Jones' statements about Sandy Hook; right?

5 A. Yes.

6 Q. Okay. And Mr. Jones, once he gave that  
7 interview, was not happy with how it went. You would  
8 agree with that?

9 A. Yes, because she lied about why she was  
10 inviting him.

11 Q. Yeah, she kind of suckered him into a hit  
12 piece, huh?

13 A. Pretty much. Set a trap for him.

14 Q. Entrapped him. A good reporter might go to  
15 a subject and, say, try to soften his defenses and say,  
16 oh, Mr. Jones you're so important, so powerful, we would  
17 really like to interview you. But then when she got in  
18 the room she went a different direction, didn't she.

19 A. And I believe she specifically said it  
20 wasn't going to be about Sandy Hook, which is why he  
21 accepted the interview. Because he wasn't the one who  
22 wanted to keep the conversation about Sandy Hook going,  
23 it was her and the mainstream media attaching him to the  
24 Sandy Hook.

25 Q. And he wanted to stop talking about Sandy

1 Hook because he was potentially facing some legal  
2 threat; right?

3 A. I don't know that.

4 Q. Okay. Let's take a look at a video. Do you  
5 remember -- let's take a look on your list there  
6 June 13th, 2017. Do you see that?

7 A. Yes.

8 Q. Okay. And do you see there was an episode  
9 entitled "Media Refuses to Report Alex Jones' Real  
10 Statements on Sandy Hook." Is that right?

11 A. Yes.

12 Q. Okay. Let's take a look at that clip.  
13 Let's look at PVX 21A.

14 *(Video played off the record.)*

15 MR. BANKSTON: Your Honor, if I could just  
16 have a second to pull up a screen.

17 BY MR. BANKSTON:

18 Q. Now, do you remember a part of this video  
19 where Mr. Jones, and this is going to be advancing it to  
20 this part, was reading through this list; right?

21 A. Yes.

22 Q. Okay. Not true, right? Number one, not  
23 true; correct?

24 A. These are -- I can't agree. I mean, these  
25 are the questions. He's making a point that Sandy Hook,

1     sorry, that ZeroHedge is actually reporting on what his  
2     questions are. I think that's the point that he's  
3     making here.

4             Q.     Right. "His" means Jones'.

5             A.     Yes.

6             Q.     Why does the Sandy Hook school website  
7     traffic have zero traffic for four years.

8                     That's not true; right?

9             A.     Correct, but that's his question that they  
10    won't report on.

11            Q.     Well, it's not a question, Miss Karpova,  
12    it's a statement; right? If I was to say, Miss Karpova,  
13    why do you steal from the school? Why do you steal?  
14    Why do you lie? Why do you cheat? Those are false  
15    statements; right?

16                    That's false. There was -- this is false,  
17    this is a false question; right?

18            A.     Right.

19            Q.     Okay. False. Right? No one dressed in  
20    camouflage fled into the woods; right?

21            A.     The questions that Alex Jones has.

22            Q.     And they're false. There were no shooters  
23    who dressed in camouflage. You can't answer why that  
24    happened if there were none. Correct?

25                    MR. REYNAL: Objection. Asked and

1 answered.

2 THE COURT: She didn't answer. So  
3 overruled.

4 BY MR. BANKSTON:

5 Q. Right?

6 A. I'm sorry, repeat that again?

7 Q. You can't answer the question why these  
8 people in camouflage fled into the woods if there were  
9 no people. There's no "why" answer if there were none.  
10 That's false. Right?

11 A. Well, if the answer would have been, you  
12 know, false reports that he had seen, I mean, you can  
13 still answer the question.

14 Q. There's no false -- Mr. Jones says this,  
15 camouflage, fled in the woods. He just made it up;  
16 right?

17 A. No, he's basing his question off the videos  
18 that he had seen.

19 Q. What videos? Of somebody in camouflage  
20 fleeing into the woods?

21 A. Something like that, yes.

22 Q. All right. Porta potties, sandwiches,  
23 fruit, chips, and drinks brought up inside the school.  
24 That's a lie. That's not true. Right?

25 A. Again, that's a question that he has in his

1 mind. The question is true because he's -- that's his  
2 question. I'm not sure -- that's his question and  
3 they're reporting on. I think that's the whole point.

4 Q. Did you notice how he started to read this  
5 one right here? He started to go, "Sandy Hook," and  
6 then he stopped and then he highlighted the next one.  
7 Did you see that?

8 Let's play it again, Malisa. Can you play  
9 that segment right now? I want to see it.

10 *(Video played off the record.)*

11 He was about to read it, wasn't he?

12 A. Alex Jones does that a lot. I don't think  
13 it means anything.

14 Q. You don't think -- so, you don't think it  
15 was -- let me ask you this, earlier in this trial we  
16 heard from Detective Dan Jewiss, and he was talking --  
17 he at least knew of one other person who was  
18 specifically identified by InfoWars who had brought  
19 similar claims named Lenny Pozner. You knew about him;  
20 right?

21 A. Yes.

22 Q. Robbie Parker is another, isn't he?

23 A. Yes.

24 Q. So, Mr. Jones didn't want to say his name  
25 anymore.



1           A.    I don't know what he was -- but Alex Jones  
2   is known to skip lines whenever he reads stuff in the  
3   articles just because his mind is racing, he skips  
4   through lines.

5           Q.    Sure.  Okay, Miss Karpova --

6                    You can take this down.

7                    The Megyn Kelly interview aired, and then  
8   you understand we've talked about this in your  
9   deposition that a week later there was a video with Owen  
10  Shroyer talking about Neil Heslin's statement that he  
11  held his boy after Sandy Hook.  You know that?

12          A.    Yes.

13          Q.    Okay.  We're going to talk a little bit  
14  about that video of Owen Shroyer.

15                   I understand you weren't the director  
16  involved in that video; right?

17          A.    Yes.

18          Q.    But I do want to show you one thing we've  
19  talked about in it.

20                   And can you bring up for me slide 62.

21  This is going to be from --

22                   THE COURT:  This is an exhibit or --

23                   MR. BANKSTON:  Yes.  It's going to be from  
24  PVX 23.  This was a slide from the opening statement,  
25  okay?  All right.

1 BY MR. BANKSTON:

2 Q. This is a screen shot from Plaintiffs' video  
3 Exhibit 23. The Owen Shroyer broadcast that Mr. Shroyer  
4 will be discussing with us later, but if you look right  
5 here, the article that InfoWars was citing contained  
6 information from Jim Fetzer. That's right?

7 A. Yes.

8 Q. Okay. Would you agree with me,  
9 Miss Karpova, at the time of this video InfoWars knew  
10 there were issues regarding Mr. Fetzer's credibility.  
11 They knew that.

12 A. If you're referring back to the email from  
13 Paul Watson --

14 Q. I am not, ma'am. Just can you answer that  
15 question?

16 A. I'm not sure, I'm sorry.

17 Q. Okay. You remember giving your deposition  
18 in 2021, don't you?

19 A. Yes.

20 Q. Okay. Ma'am, I'm going to approach you with  
21 your deposition. We're going to be reading this excerpt  
22 here.

23 Do you see that?

24 A. Yes.

25 Q. Okay. I'm going to ask you:

1                    "If Owen, and given your previous answer,  
2                    given that there was some -- InfoWars was aware that  
3                    there were some issues being raised of Mr. Fetzer's  
4                    credibility, that happened in the exact same year that  
5                    Owen published this video in 2017."

6                    What was your answer?

7                    A.     "Right."

8                    Q.     My question was: "So, if Owen relied on, if  
9                    it did happen, that Owen's video contains material from  
10                   Mr. Fetzer, it was done so at a time where InfoWars knew  
11                   there were issues regarding his credibility."

12                   Ma'am, what was your answer?

13                   A.     "Yes."

14                   Q.     You can go down to October 26, 2017. We're  
15                   almost done.

16                   Do you see a video there?

17                   A.     Yes.

18                   Q.     And it says "JFK Assassination Documents to  
19                   Drop Tonight." Is that correct?

20                   A.     Yes.

21                   Q.     Okay. Let's play from there PVX 24A.

22                   *(Video played off the record.)*

23                   So, there we're hearing Mr. Jones saying  
24                   it's phoney as a \$3 Bill; right?

25                   A.     That's an expression, yes.

1 Q. During his programming Mr. Jones would  
2 frequently switch gears midstream and start asking his  
3 audience to buy his products; right?

4 A. Are you talking about ads that he does?

5 Q. Sure. In the middle of his giving news and  
6 then suddenly he'll just transition over and start  
7 selling products; right?

8 A. That's called a plug. That's what he does  
9 on a regular basis.

10 Q. Yeah. Let's take a look at that. Let's  
11 look at that same video October 26, 2017.

12 Can we play PVX 17?

13 *(Video played off the record.)*

14 So, InfoWars tells its audience that  
15 buying its products will help InfoWars fight back  
16 against the globalists who staged Sandy Hook. That's  
17 what they're telling them.

18 A. That's not what he said.

19 Q. Well, we know what he's talking about when  
20 he says the globalists, right? That's the billionaires  
21 who control and stage and enslave America under Alex  
22 Jones' view; right?

23 A. That's part of it.

24 Q. Part of it, right.

25 And when Mr. Jones said earlier, "The

1 people who did Sandy Hook," he's talking about the  
2 globalists, isn't he?

3 A. Well, this --

4 Q. When Mr. Jones said -- when he said the  
5 people who did Sandy Hook, he was talking about the  
6 globalists?

7 A. You're talking about the ad?

8 Q. No, Miss Karpova, I'm talking about when we  
9 heard today Mr. Jones say, "The people who did Sandy  
10 Hook," he means the globalists.

11 A. Well, I -- I previously told you yes --  
12 earlier today that I didn't specifically know who he was  
13 referring to.

14 Q. Okay. Now, we get to the end here, as the  
15 new year changes, and we come into 2018, and you  
16 understand that this suit was filed. Suit was filed  
17 against InfoWars based on all of the events we're  
18 talking about and Owen Shroyer's video and everything.  
19 You know that happened in 2018. Right?

20 A. Yes.

21 Q. Okay. Miss Karpova, by my count we've now  
22 seen something like 20-plus videos of your employer Alex  
23 Jones denying Sandy Hook ever happened, more importantly  
24 denying the existence in the death of their son, Jesse,  
25 that's correct?

1           A.    I don't agree with that.

2           Q.    Okay.  You're also aware of other videos  
3 where Mr. Jones tried to walk back these disgusting  
4 claims.  Are you aware of those videos?

5           A.    Every time he's -- every time he is  
6 questioning Sandy Hook he's also saying that he doesn't  
7 know what happened and he -- some videos he says that he  
8 now believed that children were killed.

9           Q.    Right.

10                   And the reason he started late in this  
11 period to try --

12                   If you need to stand up, stand up.

13           MR. REYNAL:  I do.

14                   Your Honor, I think you previously ruled  
15 that post-suit videos weren't come in because they  
16 discuss the case and what's going on.

17           THE COURT:  I have not made that ruling.  
18 What we said was, if you wanted to bring in -- oh, that  
19 was something different.  I don't remember that.  Is it  
20 on the list?  Is it --

21           MR. REYNAL:  I think it was discussed at  
22 the pretrial conference.

23           MR. BANKSTON:  I'm sorry, what are  
24 we -- I'm confused what we're talking about.

25           THE COURT:  Let's do this, let's wait

1 until we have a question or an exhibit and then you can  
2 object if you think you have an objection.

3 BY MR. BANKSTON:

4 Q. In 2017 to 2018 --

5 THE COURT: I don't know.

6 BY MR. BANKSTON:

7 Q. -- right before this suit was filed,  
8 Mr. Jones was trying to walk back some of his claims  
9 about Sandy Hook, right?

10 Right?

11 A. I don't know what you mean by "walk back."

12 Q. It means he was trying to now say, as  
13 opposed to all those earlier videos that you saw where  
14 he said it was completely fake, totally synthetic, at  
15 first I thought they killed real kids but I did deep  
16 research and it didn't happen, he started to change his  
17 tune a little bit in late 2017 to 2018, didn't he, he  
18 tried to walk some of that back?

19 A. I don't think so. He's always wavered. He  
20 always said that he didn't know exactly what happened  
21 but he was trying to get to the truth.

22 Q. I'm not -- you would think that some of the  
23 videos we saw today, he said he didn't know what  
24 happened.

25 A. Yes.

1 Q. That's your testimony? Okay.

2 A. He did say that.

3 Q. Now, the truth is, Miss Karpova, the reason  
4 that he started to say some of these things and start to  
5 back off is because he was under threat of legal action;  
6 right?

7 A. I don't believe that.

8 Q. Okay. And even after Mr. Jones walked it  
9 back, up until very, very recently, as we saw in opening  
10 statement, he was still saying it was synthetic; wasn't  
11 he?

12 A. I believe his -- throughout the years he was  
13 wavering on the subject, not knowing what the truth was  
14 and trying to get to it the best he could.

15 Q. What I'm asking you is, in October of 2021,  
16 as we saw in opening statement, Mr. Jones kept on saying  
17 Sandy Hook is synthetic. Correct?

18 A. He also says "in my opinion" and then he  
19 says that he doesn't know.

20 Q. Have you seen that video? You know what  
21 video I'm talking about?

22 You weren't here for opening statement;  
23 right?

24 A. I was.

25 Q. Oh, you were?



1           A.     Not for the entire opening statement. I  
2     came in later.

3           Q.     Okay. So, you saw that video in  
4     October 2021, then Mr. Jones still saying it's  
5     synthetic, isn't he?

6           A.     He has his definition of what he means by  
7     that.

8                     MR. BANKSTON: Okay. Miss Karpova, I have  
9     no more questions for you.

10                    THE COURT: All right. Mr. Reynal.

11                             CROSS-EXAMINATION

12     BY MR. REYNAL:

13           Q.     So, you've been on the stand for a long  
14     time. We've discussed a variety of different issues,  
15     and I think that it would be best if we established  
16     first some time periods.

17                     So, can you tell the Members of the Jury  
18     when it was that you first began to work at InfoWars?

19           A.     Late 2015.

20           Q.     So many of the videos that we've watched and  
21     articles that we've looked at, they were produced and  
22     put out before you worked there?

23                     MR. BANKSTON: Objection. Leading.

24                     THE COURT: Sustain.

25     ///

1 BY MR. REYNAL:

2 Q. Many of the videos that we -- well, let me  
3 ask you this, were you working at InfoWars or were you  
4 somewhere else in 2013 when some of the videos that we  
5 watched were produced?

6 A. I was not at InfoWars.

7 Q. And in 2014 were you working at InfoWars or  
8 were you working somewhere else when those videos were  
9 produced?

10 A. Somewhere else.

11 Q. And in 2015, what month did you say that you  
12 began?

13 A. October.

14 Q. So, prior to October 2015 were you working  
15 at InfoWars or were you working somewhere else?

16 A. I was working somewhere else.

17 Q. Okay. Now, what was your first job at  
18 InfoWars?

19 A. I was hired as a sound engineer.

20 Q. And were you living in Texas or were you  
21 living somewhere else before that?

22 A. I was living somewhere else.

23 Q. And what -- how did you hear about the job  
24 at InfoWars?

25 A. It was a long time, but I believe I

1     overheard an ad, Alex was recruiting for more crew  
2     personnel and he asked for -- to send in resumes with  
3     qualifications.

4             Q.     And so you were an InfoWars listener at the  
5     time?

6             A.     I wouldn't say so, but I knew of Alex Jones.

7             Q.     And did you watch his programming on  
8     occasion?

9             A.     On occasion I would say.

10            Q.     And what was your general impression of his  
11     programming at the time?

12            A.     Um, bombastic, a lot of information that I  
13     wasn't able to process because I had other jobs, other  
14     things to take care of. It's a three-hour, four-hour  
15     broadcast, it's just hard to keep up with everything  
16     that he's saying. That was my general impression.

17            Q.     Did you like the show?

18            A.     I didn't dislike it.

19            Q.     Okay. Liked it enough to listen to it on  
20     occasion?

21            A.     Yes.

22            Q.     So, when you started there how long did it  
23     take before you moved into production?

24            Q.     Well, as a sound engineer, still considered  
25     part of production since I'm there during the show. I'm

1 engineering the music, bumpers, in and out, I'm hearing  
2 Alex between the breaks. If I need to do something else  
3 I would be, you know, available to do that. So, I'm  
4 sort of part in that atmosphere of production in the  
5 control room.

6 Q. And did you have a prior career, in your  
7 education do you have some experience in music and  
8 sound?

9 A. Yes, I do.

10 Q. And can you tell us about that?

11 A. Well, I grew up playing piano classically.  
12 I've always had passion for music. After I got out of  
13 the military I was thinking, what should I do now? And  
14 I wanted to see, you know, I kind of talked to myself  
15 and thought what was it that I wanted to do and I wanted  
16 to go back to my true passion, which was music. And I  
17 figured out what I could do in that area and I decided  
18 to become a music engineer. It was something up my  
19 alley, I really enjoyed it.

20 Q. When you -- so, you got the job and you  
21 moved to Austin?

22 A. Correct.

23 Q. And when you first started work what was  
24 your impression of -- well, can you describe for the  
25 jury what the InfoWars studio is like. What does it

1 look like?

2 A. Cameras, screens, very well taken care of,  
3 clean. Lots of lights, a lot of things going on at one  
4 time every day. People running around, people trying to  
5 give Alex what he's asked for. So, just busy, busy  
6 environment, I would say.

7 Q. And how many hours a day is InfoWars  
8 producing content, at least when you started back in --  
9 I think you said October? Is that correct?

10 A. Yes.

11 Q. Of 2015.

12 A. Let me think. I would say around eight,  
13 nine hours of content per day.

14 Q. And how many days a week?

15 A. A lot of weeks seven days a week.

16 Q. And now I'm going to ask you, in your role  
17 as corporate representative, has that been consistent  
18 since before the events that led to this lawsuit in 2012  
19 occurred? In other words, was InfoWars back then also  
20 producing eight or nine hours of content per day?

21 A. You mean before I started?

22 Q. Yeah, I'm asking you in the corporate role  
23 that's been imposed upon you.

24 A. Yes, that's been about the same.

25 Q. Okay. And so -- and that's so if we were to

1 think about that -- well, let's back up.

2 Alex Jones, how many hours per day is he  
3 on the air?

4 A. At least four hours a day.

5 Q. How many days a week?

6 A. On average seven days a week.

7 Q. Okay. And so, if we did some math, do you  
8 have an estimate of about how many hours he would be on  
9 the air in any given week?

10 A. Some weeks it's busier than others because  
11 during very busy times, like the election, the midterms,  
12 I mean he is on air 24/7. So, it's just -- it's very  
13 hard to estimate. But I would say it's a lot.

14 Q. So, if we did four times let's say six, that  
15 it would be 24 hours a week?

16 A. I would say so.

17 Q. Plus there's other coverage, as well.

18 A. Yes.

19 Q. Now, we've gone through the videos or at  
20 least clips from the videos in this case. And do you  
21 recall the years that they spanned?

22 A. These videos on the list, yes.

23 Q. Feel free to look.

24 A. Starting 2012 into 2017.

25 Q. And based upon your knowledge of how many

1 hours per week per year and about how many hours of  
2 video here, is it fair to say that Alex Jones devoted  
3 more or less than one-half of one percent of the total  
4 time of InfoWars coverage at Sandy Hook?

5 A. In my opinion, less.

6 Q. Less than half of total -- of one percent of  
7 total air time.

8 A. If I had to estimate, yes.

9 Q. What are your job responsibilities now?

10 A. Well, to make it easy I put it just -- I  
11 would say think of a general contractor, they're just  
12 responsible for making sure the people who are tasked  
13 with their job are doing their job. So, I oversee that  
14 the production is started off right, that everything is  
15 technically going correctly during the broadcast, that  
16 Alex gets everything he needs. If I need to delegate  
17 something to happen I will do that but -- if I find the  
18 right person to complete that job. If something is  
19 required of me to do, I will do that, as well. I  
20 coordinate guests.

21 Q. Do you prepare a script for Mr. Jones?

22 A. Never. Absolutely not.

23 Q. Does anyone prepare a script for Mr. Jones?

24 A. Absolutely not.

25 Q. Is there ever a script for any of his shows?

1 A. No.

2 Q. Does anybody have really any idea what  
3 granularly is going to occur on the show?

4 A. No, not ever.

5 Q. Is that -- would you describe that as part  
6 of the appeal of the Alex Jones show?

7 A. Absolutely. I think that's why -- and it  
8 was also part of my appeal when I tuned in the show on  
9 the rare occasions that I had before I started working  
10 there and why I actually wanted to work there, because  
11 it seemed like just kind of a fun place where people  
12 aren't -- their shoulder isn't being looked over and  
13 they're allowed to be creative, to express their  
14 opinion.

15 What was the question? I'm sorry.

16 Q. The question was whether it's part of the  
17 appeal of the show that it's unscripted.

18 A. Yes, I believe so very much. That's why  
19 people tune into it, because it's so much different than  
20 a lot of the established media out there that people are  
21 used to.

22 Q. Is the entire show devoted to mass casualty  
23 events and school shootings?

24 A. No, absolutely not.

25 Q. Do you all cover UFOs?



1           A.    I don't remember the last time we covered  
2   that, no.

3           Q.    But has Alex covered UFOs and --

4           A.    Maybe occasionally.

5           Q.    How about David Icke's lizard people idea?

6           A.    Alex makes fun of David for that.

7           Q.    And can you tell us some of the -- has he  
8   covered issues related to the effect of groundwater on  
9   the breeding habits of frogs?

10          A.    Repeat that question?

11          Q.    Did he do a segment that talked about how  
12   the plastics that were in water were affecting the  
13   breeding habits of frogs so that they would not  
14   reproduce?

15          A.    Yes, he's done segments on that and they've  
16   become, I mean, very popular on internet. So, he's gone  
17   back to it and, you know, shown studies from Berkley,  
18   videos from professors, again from Berkley University,  
19   showing how the frogs have morphed their original sex  
20   and became the opposite sex due to the chemicals in the  
21   water.

22          Q.    And does he occasionally appear on his show  
23   in costume?

24          A.    Yes.

25          Q.    And does he paint his face?

1 A. Yes.

2 Q. And on occasion does he act like a wrestler  
3 on his show?

4 A. Yes.

5 Q. And rip his shirt off.

6 A. Yes.

7 Q. And do people find it amusing?

8 A. They do.

9 Q. Would you say that everybody who tunes into  
10 the Alex Jones show tunes in because, you know, they  
11 love everything he has to say?

12 MR. BANKSTON: Objection. Speculation.

13 THE COURT: Sustained.

14 BY MR. REYNAL:

15 Q. As part of your job as a production  
16 assistant have you had occasion to get to know members  
17 of Alex Jones' audience?

18 A. Yeah, we have people call in, make  
19 conversation with a lot of people, go to -- if there's a  
20 rally or event he goes to his listeners go there, too.

21 Q. And does everybody who call in agree with  
22 everything that Alex says?

23 MR. BANKSTON: Objection. Hearsay.

24 THE COURT: Sustained.

25 ///

1 BY MR. REYNAL:

2 Q. From a production standpoint, would you say  
3 that part of Alex's show is appealing to people who love  
4 to hate him?

5 MR. BANKSTON: Objection. Leading, Your  
6 Honor.

7 THE COURT: I think you could do a better  
8 job not leading a witness who works for your client.

9 BY MR. REYNAL:

10 Q. What would you say is, if you described as a  
11 production person, the type of audience that's out  
12 there, what different types of segments of people are  
13 watching the show or listening to it.

14 A. Well, I can tell you personally that a part  
15 of my duties is to take calls, and I hear it all. A lot  
16 of people call in, diehard Alex's fans, they want to  
17 contribute information, Alex can do nothing wrong --

18 MR. BANKSTON: Your Honor, we object to  
19 the hearsay of what these people are saying.

20 BY MR. REYNAL:

21 Q. Without telling us what they said, can you  
22 just tell us generally what you understand from speaking  
23 to these people.

24 A. Correct. Some people love him, some people  
25 genuinely hate him.

1 MR. BANKSTON: Your Honor, objection. It  
2 still calls for hearsay.

3 THE COURT: Yeah, I mean it -- let me just  
4 read it.

5 The answer is giving us hearsay.  
6 Sustained.

7 BY MR. REYNAL:

8 Q. So, at some point you were asked to be  
9 a -- well, let me back up just one more.

10 Would you describe Alex's show more as  
11 radio or as television?

12 A. I would say both. It's very  
13 television-driven because we do produce --

14 Q. You have to speak up a little bit.

15 A. It's very television-driven because we do  
16 produce imagery on screen, and it's a lot more  
17 interactive for the audience. Our guests come on via  
18 video. But I would also think it's -- I would also say  
19 that it's a radio show in itself also, yes.

20 Q. How much of the content that's on InfoWars  
21 or that's -- Alex talks about, how much of that is  
22 self-produced original journalism and how much of it is  
23 just discussing things that are found on the internet or  
24 that are trending.

25 A. The vast majority is the latter.

1 Q. And by the latter, you mean?

2 A. It's taken from other sources, current  
3 breaking news, articles, videos.

4 Q. At some point you were asked to be the  
5 corporate representative for InfoWars?

6 A. Yes.

7 Q. And when was that?

8 A. About a year ago.

9 Q. And do you recall as part of that being  
10 asked to review certain documents that had been turned  
11 over to the personal injury lawyers?

12 A. Your question was again?

13 Q. Do you recall being asked to review the  
14 documents produced in this case?

15 A. Yes.

16 Q. What did you understand that to mean?

17 A. I didn't really, because I didn't exactly  
18 understand what it meant, because the amount of  
19 documents is so vast. I wasn't really pointed to  
20 specific documents to review.

21 Q. When you say the amount of documents was  
22 vast, what do you -- give us a sense of scale, please.

23 A. I think millions of emails.

24 Q. Do people email InfoWars, and I'm asking you  
25 as a corporate representative, do people email InfoWars

1 frequently?

2 A. Every day.

3 Q. About how many emails does InfoWars receive  
4 on a given day?

5 A. Thousands of thousands.

6 Q. And was that as true in 2012 as it is today?

7 A. Yes.

8 Q. And how many people work at InfoWars?

9 A. Its entire company?

10 Q. Uh-huh.

11 A. I believe between 50 and 80. Just varies.

12 Q. And how many of those people are tasked with  
13 reading this volume of emails that are coming in?

14 A. No one.

15 Q. Of the emails that were turned over, were  
16 most of them opened or unopened by InfoWars staff?

17 A. Most of them were unopened.

18 Q. You've been asked about a bunch of different  
19 documents earlier that had a label on the bottom. Do  
20 you know that to be what's called a Bates label?

21 A. I'm not sure what that means.

22 Q. Okay. The series of digits on the bottom  
23 that Mr. Bankston described, do you remember that?

24 A. Yes.

25 Q. Now, some of those, if you look at the

1 header, they do not have an InfoWars employee.

2 MR. BANKSTON: Objection. Leading. And I  
3 would ask that the point for an instruction so that  
4 Mr. Reynal knows what leading is.

5 THE COURT: Sustained.

6 Mr. Reynal, you need to stop leading the  
7 witness. This is not an actual cross-examination.

8 BY MR. REYNAL:

9 Q. Do you recall being asked about a  
10 Plaintiffs' Exhibit 66?

11 A. Yes. I have it right here.

12 MR. BANKSTON: Your Honor, I have a quick  
13 issue I was hoping I could approach on.

14 THE COURT: All right.

15 MR. BANKSTON: An objection very quickly.

16 THE COURT: Okay.

17 *(Whereupon a discussion was held at the*  
18 *bench off the record.)*

19 BY MR. REYNAL:

20 Q. Earlier I asked you about how many emails  
21 have been produced. Do you recall that?

22 A. Yes.

23 Q. Is it fair to say that, rather than  
24 millions, it was hundreds of thousands?

25 A. Yes.

1 Q. Now, I'm showing you this -- do you see this  
2 number here?

3 A. Yes.

4 Q. What does that number mean to you?

5 A. I was told that means that it was in the  
6 corporate file.

7 Q. Okay. Do you know or can you say when  
8 InfoWars received --

9 A. No.

10 Q. -- this document?

11 A. No.

12 Q. Do you think or can you say whether it was  
13 before or after 2017?

14 A. It could have been after. Could have been  
15 after, I don't know.

16 Q. And there were -- do you recall, you were  
17 asked about Plaintiffs' Exhibit 63?

18 A. Yes.

19 Q. Will you remind us what that is?

20 A. That is an email from Wolfgang Halbig to  
21 Scarlett.

22 A. And do you see an InfoWars person anywhere  
23 on that email?

24 A. No.

25 Q. Do you know how this email came into the



1 possession of InfoWars?

2 A. I do not.

3 Q. Do you recall around when InfoWars made its  
4 production?

5 A. 2018?

6 Q. Do you have an opinion as to when this came  
7 into the possession of InfoWars or how?

8 A. I don't know. I don't want to speculate. I  
9 have no idea.

10 Q. I want to go back and talk about the time  
11 period between 2012 and 2013. And the type of coverage  
12 that InfoWars was giving at the time.

13 You have your list of videos in front of  
14 you?

15 A. Yes.

16 Q. I'm going to direct you to a video called  
17 "Sandy Hook Second Shooter Coverup." It's  
18 December 19th, 2012.

19 How many days after the shooting is that?

20 A. Five days.

21 Q. Okay. We're going to play the video.

22 MR. BANKSTON: The whole exhibit?

23 MR. REYNAL: Yes.

24 THE COURT: What exhibit number is this?

25 MR. REYNAL: Exhibit -- Defense Exhibit 4,

1 Your Honor.

2 THE COURT: Well, no defense exhibits have  
3 been admitted, so you're not playing that yet.

4 MR. REYNAL: Your Honor, we stipulated --

5 THE COURT: No, it has not been admitted.  
6 We had a conversation at pretrial, no one was prepared,  
7 so you need to move to admit it. You might have an  
8 agreement, but I don't know about it and it's not on the  
9 record.

10 MR. REYNAL: Defense moves to admit  
11 Defense Exhibit 4.

12 THE COURT: Any objection?

13 MR. BANKSTON: No, Your Honor. The  
14 plaintiffs have their exhibits, so we object to hearsay  
15 on this one.

16 THE COURT: So do you object or not?  
17 Because you said "No."

18 MR. BANKSTON: Yes, no, for our videos  
19 we're okay. His is hearsay. We can use them against a  
20 party for hearsay, but this is an out-of-court statement  
21 of Alex Jones. He can't use it against us.

22 THE COURT: All right. Here is what we're  
23 going to do. You guys are going to get to go home  
24 14 minutes early and we're going to finish up this,  
25 because --

1                   So, all of my rules and restrictions still  
2                   apply: Do not watch the news, don't go on social media,  
3                   don't talk to anyone about anything that's happened here  
4                   in this case. Ms. Matusek-Steele is going to give you  
5                   the information that I was going to give you because I'm  
6                   going to be out here. It's very brief. If you have any  
7                   questions we can talk about it in the morning.

8                   We'll see you here at 8:45 so we can get  
9                   started again tomorrow. All right? Thank you so much.

10                   *(Whereupon the jurors exit the courtroom*  
11                   *and the following proceedings were held in open court:)*

12                   THE COURT: All right, everyone can sit  
13                   down.

14                   All right, let's roll back first. You  
15                   wanted to raise an objection about I think her answer.  
16                   I don't know what it was. What was the objection?

17                   MR. BANKSTON: My -- actually, Your Honor,  
18                   can you allow me to consider that? Let's table that for  
19                   now.

20                   THE COURT: All right. So, now we have a  
21                   conversation we should have had at pretrial. You want  
22                   to admit some of the videos.

23                   I'm waiting for the door to shut.

24                   And you want to object. So, right now we  
25                   just have Defense 4.

1 MR. BANKSTON: Okay.

2 THE COURT: Okay --

3 MR. BANKSTON: So, here would be my  
4 objections.

5 THE COURT: All right.

6 MR. BANKSTON: The first objection is that  
7 the video is hearsay. It's an out-of-court statement  
8 not being used against the party, right? It's Jones and  
9 I'm using it, my exhibits come in. He can't just put on  
10 extrajudicial statements of his client at length. He  
11 can't do that.

12 My second objection is that you ordered us  
13 on March 10th to specifically identify any clips that we  
14 wanted to play from the videos. Partially this is  
15 because for the reasons of optional completeness I need  
16 to know what they're planning before and after. There's  
17 no clips. So now we just have this full video.

18 When we got to pretrial we made an  
19 agreement, and that agreement was we don't have to  
20 discuss all these objections and all these things I'm  
21 talking to you about now because not only did he provide  
22 not provide me clips but he made the agreement that day,  
23 and he made it again, that the only reason that  
24 Defendants would be offering video evidence in this case  
25 is for optional completeness.

1           As such, I have not had a chance to lodge  
2 any of the objections or, in fact, even review the  
3 things on Defendant's exhibit list, because the only  
4 reasons I would ever think they would come in is if I  
5 offered something with a misleading statement and he  
6 identified for you a specific statement in another -- an  
7 unplayed part that needed to be played to make that  
8 fully understood.

9           Now, without that, and now he's talking  
10 about adding in the substantive evidence, not only do I  
11 have the hearsay, but he violated your pretrial order.  
12 He's had my clips for months and then I was under the  
13 impression we were only doing optional completeness.

14           I, almost certainly, if I need to go  
15 through his Defense exhibits, am going to find loads of  
16 objectionable material, things that totally violate your  
17 orders. I was never offered any opportunity to do that,  
18 and he just totally violated your pretrial order.

19           THE COURT: All right.

20           MR. REYNAL: I couldn't disagree more. I  
21 think that Attorney Bankston is being absolutely  
22 dishonest with the Court.

23           THE COURT: Let's just focus on the issue.

24           MR. REYNAL: We -- Exhibit 31 is a summary  
25 of voluminous records that I agreed to because we agreed

1 that they were all in evidence. That's what a summary  
2 of voluminous records is. Under the rules it has to be  
3 in evidence to be a summary. And Mr. Bankston agreed to  
4 that.

5           Beyond that, we have an intentional  
6 infliction of emotional distress claim here which is  
7 based on the coverage that InfoWars gave to Sandy Hook  
8 during the period between 2012 and 2018. And this is  
9 the coverage that InfoWars gave to Sandy Hook during  
10 that period. So, it's absolutely important substantive  
11 evidence in the case that he already agreed to.

12           It's also a business record of the  
13 company, if you want me to go through that dance. But I  
14 don't think it's necessary, given Mr. Bankston's earlier  
15 agreement that this was all in; and it's important  
16 substantive evidence in the case.

17           THE COURT: All right. It is not, the  
18 summary, what you're calling the summary, Plaintiff's  
19 Exhibit 31, was told to me is an agreed list of videos.  
20 So, that is a very vague sentence, it doesn't say it's a  
21 summary exhibit. Maybe that was your understanding,  
22 maybe that was your agreement. I don't know. It's not  
23 how it was presented to me. That's number one.

24           You have an intentional infliction of  
25 emotional distress verdict, not claim. It's already

1 been decided. So, you don't get to defend against the  
2 intentional infliction of emotional distress, you only  
3 get to defend against damages.

4 MR. REYNAL: Your Honor, the videos  
5 themselves, Plaintiffs have been playing them for a  
6 reason. Since the beginning of this case I've been  
7 saying that during this period we should just be  
8 focusing on the actual damages suffered by the  
9 plaintiffs. Instead, Plaintiffs have chosen to play  
10 little clips from cherry-picked videos throughout this  
11 period.

12 They agreed before that these would come  
13 in, and now I'm hearing for the first time that I can't  
14 put them in. They are relevant to showing the level of  
15 emotional distress that the jury can infer was caused by  
16 these publications.

17 MR. BANKSTON: I mean, if you did want to  
18 hear from me, Your Honor, if there was an agreement that  
19 I made I think it would be put in front of you. I think  
20 there would be a Rule 11.

21 I emailed Mr. Reynal about these to say  
22 that that list of videos, which is an agreed list of  
23 videos that were produced in this case, all right. I  
24 have certainly never agreed to the admission of any  
25 Defense exhibits. And we went through, you'll remember,

1 we went through at pretrial what was admitted. All  
2 right.

3 I'm very disturbed about the idea that  
4 they blatantly defied your order to designate what they  
5 were going to play. And that they have made the only  
6 agreement we have in open court, the only one, is that  
7 they will only offer evidence for optional completeness.  
8 I'm fine with that. If they want to offer things in my  
9 case because they need to be to fully under something  
10 that I mislead, I'm fine with that. What I'm not fine  
11 with is now being told that now we're offering  
12 substantive evidence. That was never -- that's what's  
13 in violation of the agreement in open court.

14 And so, not only do I think they are  
15 hearsay, and we can probably talk about that, because  
16 there's hearsay in hearsay in here, right; but the fact  
17 they violated your pretrial order, the fact that I did  
18 everything you asked me to, you told us, show me what  
19 your substantive evidence is going to be, and I didn't  
20 get that, that's real disturbing to me. They've had all  
21 my evidence for months.

22 THE COURT: Is this video one of the ones  
23 that you played part of today?

24 MR. BANKSTON: No.

25 THE COURT: It's not.



1 MR. BANKSTON: No.

2 MR. REYNAL: And, Your Honor, I'm hearing  
3 a lot about video clips. It's a nine-minute video. I'm  
4 going to play the whole thing. And beyond that, there  
5 is --

6 THE COURT: Well, here is why I asked you  
7 to exchange your exhibits before trial and be prepared  
8 at pretrial to go through the list. And what I remember  
9 is that when I said, okay, let's go through the  
10 Plaintiffs' exhibits, we did that, and then I said,  
11 let's go through these, do you have them, and you didn't  
12 have them here. I didn't have a list from you at that  
13 time; you weren't ready to go through them.

14 So, the problem I have is, if we have a  
15 hearsay objection to Defense Exhibit 4, I have to look  
16 at it to make that decision. I can't do it in a vacuum,  
17 where you tell me what you think it says and he -- no.  
18 I have to look at it.

19 So now I need the two of you to go through  
20 these exhibits and tell me where the hearsay is so that  
21 I can look at it before we bring the jury back.

22 MR. BANKSTON: You know, what's  
23 challenging to me, Your Honor, is that, because I was  
24 given the agreement that videos --

25 THE COURT: Are you giving me new

1 information or are you just trying to make a point.

2 MR. BANKSTON: No, I can't identify for  
3 you in this exhibit or in 30 hours of the total videos,  
4 I can't identify the hearsay. I would have, absolutely,  
5 if he had not made the agreement that we're only going  
6 to play them for optional completeness. I would have  
7 done my work pretrial, you know I would have. And I  
8 can't right now, sitting here, before we bring the jury  
9 back in or even by tomorrow morning certainly go through  
10 all the videos. Because I would have done that had he  
11 not agreed in open court, I'm only playing them for  
12 optional completeness.

13 MR. REYNAL: I never said that. Beyond  
14 that --

15 THE COURT: I mean, you did use the word  
16 "optional completeness" many, many times at pretrial.

17 MR. REYNAL: Because I wanted to play them  
18 at the time, Your Honor, instead of having to wait until  
19 it was my turn. But now it's my turn. And the fact is,  
20 we didn't review their videos, either. When we were  
21 talking about who had their exhibits, we were talking  
22 about paper exhibits.

23 THE COURT: No, we discussed the video  
24 exhibits, as well. And you agreed to them.

25 MR. REYNAL: We did. I agreed to them

1 based on their representations and we didn't review --

2 THE COURT: But that's your choice.

3 MR. REYNAL: But I'm saying when Your  
4 Honor said I didn't bring them, I had the video  
5 exhibits. It was the paper exhibits that we were  
6 talking about.

7 THE COURT: Look. You're going to have to  
8 go through the videos that you want to admit and find  
9 out if there are any that can be admitted by agreement.  
10 If there are some -- I'll just give you some guidance.  
11 If there are some that mention Sandy Hook, they're going  
12 to be admitted. If there are parts of videos, if there  
13 are parts of videos from Plaintiff's Exhibit -- Video  
14 Exhibit 1, 8, 9, 10, 12, 13, 14, 15, 16, 18, 20, 21, 23,  
15 24, 27, 31, or 30 that you think are needed to show the  
16 context of the part we've already seen, then you need to  
17 prepare that. And the way you do that is you prepare  
18 the clip so it shows it including the part Mr. Bankston  
19 showed us. That's how you do optional completeness, you  
20 do the whole thing together. So you're going to have to  
21 get that ready.

22 MR. REYNAL: I understand, Your Honor.  
23 The videos I want to play are on Mr. Bankston's list.

24 THE COURT: But did he admit them?

25 MR. REYNAL: But they're the Sandy Hook

1 videos. They don't discuss other things.

2 THE COURT: Which list? I have like eight  
3 lists in front of me.

4 MR. REYNAL: Exhibit 31.

5 THE COURT: Okay. This is just a list of  
6 video names.

7 MR. REYNAL: That were agreed to be the  
8 videos that discuss Sandy Hook.

9 THE COURT: They're not even all admitted.

10 MR. REYNAL: That's what we're talking  
11 about now.

12 THE COURT: Right. And I'm giving you  
13 some guidance on how to get them admitted.

14 MR. REYNAL: We would offer them as the  
15 business records of --

16 THE COURT: Have you filed a business  
17 records affidavit?

18 MR. REYNAL: I have a corporate  
19 representative on the stand, Your Honor.

20 THE COURT: So then you'll have to  
21 question her about them. And since all we've heard from  
22 her today is she doesn't know where to find the videos,  
23 she's never seen the videos, she doesn't think they keep  
24 the videos, they all got de-platformed, you're going to  
25 have a hard time with that.

1 All right. Anything else before we leave  
2 for the day?

3 MR. BANKSTON: I just want to make sure to  
4 clarify what I need to do for homework tonight. Do I  
5 need to figure out hearsay in all their exhibits?

6 MR. REYNAL: Yes.

7 THE COURT: I would talk to Mr. Reynal  
8 about what he is hoping to admit tomorrow and start  
9 there. We know D-4.

10 MR. FARRAR: Your Honor, can I bring up  
11 one quick issue?

12 THE COURT: I suppose.

13 MR. FARRAR: Sorry to do it now.

14 I want to be clear. All four of us are  
15 very proud of what we do. I'm a little tired of the  
16 "personal injury lawyers" stuff. It's a direct  
17 violation of Texas Disciplinary Rules sub-Preamble  
18 paragraph 4. I think it should stop.

19 THE COURT: I haven't heard it since  
20 opening. Has it been more?

21 MR. FARRAR: He did it twice today.

22 THE COURT: Oh. Stop doing that.

23 MR. BANKSTON: Thank you, Your Honor.

24 THE COURT: Is there anything else?

25 I mean, that crosses very close to the

1 line of personal attack against another counsel, which  
2 you know we don't do in our courts; right?

3 MR. REYNAL: Certainly, Your Honor.

4 THE COURT: You agree with me or you don't  
5 agree with me?

6 MR. REYNAL: I agree. They are personal  
7 injury lawyers, but I won't call them that.

8 THE COURT: Well, I mean, just --

9 MR. REYNAL: They're dishonest.

10 MR. FARRAR: That is a personal attack and  
11 that is on the record.

12 MR. REYNAL: I stood there with him and he  
13 agreed to these videos.

14 THE COURT: When, and was it on the  
15 record?

16 MR. REYNAL: It was not on the record. I  
17 took him at his word as a Texas lawyer. I shouldn't  
18 have.

19 THE COURT: Okay. So I can't -- do we  
20 need to -- I wonder if they've already left.

21 *(Discussion between the Court and Court*  
22 *staff)*

23 I think I need both of you to spend the  
24 evening figuring out where you agree, where you don't  
25 agree, what you think you had an agreement on, both of

1 you what you think you had an agreement on, and  
2 rereading the Standing Order in Limine in Travis County  
3 District Court cases, and rereading the Texas Code of  
4 Disciplinary, or whatever it's called, the Conduct Code,  
5 because, if you're going to call other attorneys in my  
6 courtroom dishonest, you're going to have to back that  
7 up.

8 For now, I'm going to assume this has been  
9 a rough day and everyone's emotions are high and you're  
10 never going to do it again and we're going to move on.  
11 But I want everyone to do those three things tonight.

12 In addition to what I asked you to do with  
13 the exhibits, you need to tell them which exhibits  
14 you're going to try to get introduced through this  
15 witness so that they can take a look at them tonight and  
16 we will meet in the morning at 9:00 and go over all the  
17 exhibits before we bring the jury in.

18 MR. FARRAR: Thank you, judge.

19 MR. OGDEN: Thank you.

20 MR. BANKSTON: Thank you, Your Honor.

21 THE COURT: That's it for today.

22 We're off the record.

23 (End of proceedings.)

24

25

## 1 REPORTER'S CERTIFICATE

2 THE STATE OF TEXAS )

3 COUNTY OF TRAVIS )

4 I, Alicia DuBois, Official Court Reporter  
5 in and for the 459th District Court of Travis County,  
6 State of Texas, do hereby certify that the above and  
7 foregoing contains a true and correct transcription of  
8 all portions of evidence and other proceedings requested  
9 in writing by counsel for the parties to be included in  
10 this volume of the Reporter's Record, in the  
11 above-styled and numbered cause, all of which occurred  
12 in open court or in chambers and were reported by me.

13 I further certify that this Reporter's  
14 Record of the Proceedings truly and correctly reflects  
15 the exhibits, if any, offered in evidence by the  
16 respective parties.

17 WITNESS MY OFFICIAL HAND this, the 9th day  
18 of September, 2022.

19 /s/ Alicia DuBois  
20 Alicia DuBois, CSR  
21 Texas CSR 5332  
22 Exp. Date: 1/31/24  
23 Official Court Reporter  
24 459th District Court  
25 Travis County, Texas  
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